

Consolidated State Application Accountability Workbook State of Vermont

**for State Grants under Title IX, Part C, Section 9302 of the Elementary and
Secondary Education Act (Public Law 107-110)**

**DUE: JANUARY 31, 2003
Revised: June 3, 2003**



**U. S. Department of Education
Office of Elementary and Secondary Education
Washington, D.C. 20202**

Instructions for Completing Consolidated State Application Accountability Workbook

By January 31, 2003, States must complete and submit to the Department this Consolidated State Application Accountability Workbook. We understand that some of the critical elements for the key principles may still be under consideration and may not yet be final State policy by the January 31 due date. States that do not have final approval for some of these elements or that have not finalized a decision on these elements by January 31 should, when completing the Workbook, indicate the status of each element which is not yet official State policy and provide the anticipated date by which the proposed policy will become effective. In each of these cases, States must include a timeline of steps to complete to ensure that such elements are in place by May 1, 2003, and implemented during the 2002-2003 school year. By no later than May 1, 2003, States must submit to the Department final information for all sections of the Consolidated State Application Accountability Workbook.

Transmittal Instructions

To expedite the receipt of this Consolidated State Application Accountability Workbook, please send your submission via the Internet as a .doc file, pdf file, rtf or .txt file or provide the URL for the site where your submission is posted on the Internet. Send electronic submissions to conapp@ed.gov.

A State that submits only a paper submission should mail the submission by express courier to:

Celia Sims
U.S. Department of Education
400 Maryland Ave., SW
Room 3W300
Washington, D.C. 20202-6400
(202) 401-0113

PART I: Summary of Required Elements for State Accountability Systems

Instructions

The following chart is an overview of States' implementation of the critical elements required for approval of their State accountability systems. States must provide detailed implementation information for each of these elements in Part II of this Consolidated State Application Accountability Workbook.

For each of the elements listed in the following chart, States should indicate the current implementation status in their State using the following legend:

- F:** State has a final policy, approved by all the required entities in the State (e.g., State Board of Education, State Legislature), for implementing this element in its accountability system.
- P:** State has a proposed policy for implementing this element in its accountability system, but must still receive approval by required entities in the State (e.g., State Board of Education, State Legislature).
- W:** State is still working on formulating a policy to implement this element in its accountability system.

Summary of Implementation Status for Required Elements of State Accountability Systems

Status	State Accountability System Element	
<u>Principle 1: All Schools</u>		
F	1.1	Accountability system includes <i>all schools and districts in the state</i> .
F	1.2	Accountability system holds <i>all schools to the same criteria</i> .
F	1.3	Accountability system incorporates the <i>academic achievement standards</i> .
F	1.4	Accountability system provides <i>information in a timely manner</i> .
F	1.5	Accountability system includes <i>report cards</i> .
P	1.6	Accountability system includes <i>rewards and sanctions</i> .
<u>Principle 2: All Students</u>		
F	2.1	The accountability system includes <i>all students</i>
F	2.2	The accountability system has a consistent definition of <i>full academic year</i> .
F	2.3	The accountability system properly includes <i>mobile students</i> .
<u>Principle 3: Method of AYP Determinations</u>		
F	3.1	Accountability system expects <i>all student subgroups, public schools, and LEAs to reach proficiency by 2013-14</i> .
F	3.2	Accountability system has a method for determining whether <i>student subgroups, public schools, and LEAs made adequate yearly progress</i> .
F	3.2a	Accountability system establishes a <i>starting point</i> .
F	3.2b	Accountability system establishes <i>statewide annual measurable objectives</i> .
F	3.2c	Accountability system establishes <i>intermediate goals</i> .
<u>Principle 4: Annual Decisions</u>		
P	4.1	The accountability system <i>determines annually the progress</i> of schools and districts.

STATUS Legend:

F – Final state policy

P – Proposed policy, awaiting State approval

W – Working to formulate policy

Principle 5: Subgroup Accountability

F	5.1	The accountability system <i>includes all the required student subgroups</i> .
F	5.2	The accountability system holds <i>schools and LEAs accountable for the progress of student subgroups</i> .
F	5.3	The accountability system includes <i>students with disabilities</i> .
F	5.4	The accountability system includes <i>limited English proficient students</i> .
F	5.5	The State has determined the minimum number of students sufficient to yield statistically reliable information for each purpose for which disaggregated data are used.
F	5.6	The State has strategies to protect the privacy of individual students in reporting achievement results and in determining whether schools and LEAs are making adequate yearly progress on the basis of disaggregated subgroups.

Principle 6: Based on Academic Assessments

F	6.1	Accountability system is based <i>primarily on academic assessments</i> .
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Principle 7: Additional Indicators

P	7.1	Accountability system includes <i>graduation rate for high schools</i> .
F	7.2	Accountability system includes an <i>additional academic indicator for elementary and middle schools</i> .
F	7.3	Additional indicators are valid and reliable.

Principle 8: Separate Decisions for Reading/Language Arts and Mathematics

P	8.1	Accountability system holds students, schools and districts separately accountable for <i>reading/language arts and mathematics</i> .
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Principle 9: System Validity and Reliability

F	9.1	Accountability system produces <i>reliable decisions</i> .
F	9.2	Accountability system produces <i>valid decisions</i> .
F	9.3	State has a plan for addressing <i>changes in assessment and student population</i> .

Principle 10: Participation Rate

F	10.1	Accountability system has a means for calculating the <i>rate of participation</i> in the statewide assessment.
F	10.2	Accountability system has a means for <i>applying the 95% assessment criteria to student subgroups and small schools</i> .

STATUS Legend:

F – Final policy

P – Proposed Policy, awaiting State approval

W– Working to formulate policy

PART II: State Response and Activities for Meeting State Accountability System Requirements

Instructions

In Part II of this Workbook, States are to provide detailed information for each of the critical elements required for State accountability systems. States should answer the questions asked about each of the critical elements in the State's accountability system. States that do not have final approval for any of these elements or that have not finalized a decision on these elements by January 31, 2003, should, when completing this section of the Workbook, indicate the status of each element that is not yet official State policy and provide the anticipated date by which the proposed policy will become effective. In each of these cases, States must include a timeline of steps to complete to ensure that such elements are in place by May 1, 2003, and implemented during the 2002-2003 school year. By no later than May 1, 2003, States must submit to the Department final information for all sections of the Consolidated State Application Accountability Workbook.

INTRODUCTION:

The following document is the revision of the Vermont Consolidated State Accountability Plan. The plan is the product of several months of planning and negotiations between the Vermont Department of Education, the Office of the Governor, State Board of Education and the U.S. Department of Education. Following the meetings between the state and federal departments on February 11, 2003; the Peer Review on April 17, 2003 and several teleconferences, the plan was refined and adjusted to meet all federal guidelines while maintaining the maximum flexibility under the law. The material is presented in "Word Format," while addressing each of the required sections and responses. New additions that represent changes since the original submission are indicated in bold type. One new Attachment, which we are identifying as Attachment ZZ, joins the original set of attachments already on file with the U.S. Department of Education.

PRINCIPLE 1. A single statewide Accountability System applied to all public schools and LEAs.

1.1 How does the State Accountability System include every public school and LEA in the State?

1.2 How are all public schools and LEAs held to the same criteria when making an AYP determination?

Public School Accountability in Vermont

All public schools in Vermont are included in the Vermont School Accountability System Based on Student Performance. The rules and operations manual were approved by the State Board in July 2000. State law requires that the Commissioner identify schools that are not making AYP. Vermont will continue to identify schools that do not make AYP. For Title I schools, the Commissioner will apply the consequences in Section 1116, to include the provision of choice, supplemental services, specific planning requirements, corrective actions and restructuring as consistent with the consequences in state law.

All public schools are held to the same criteria when making AYP determinations. Rules 2511 and 2512 establish that the system is for all schools and that its intent is to make valid and fair accountability determinations. The criteria by which this is accomplished are described in Rules and in the Operations Manual for the Accountability System, which will be updated to reflect necessary NCLBA AYP revisions.

All LEAs will also be held to the same criteria. This aspect of LEA accountability will be addressed as part of the overall transitional plan for addressing LEA accountability in light of the legislative action discussed later in this section.

In addition, Vermont will hold all public schools accountable for meeting the Vermont School Quality Standards, a broad framework that includes:

- Development and implementation of standards and learning opportunities
- Use of action plans by schools and districts to focus their improvement efforts
- Assessment of students in comprehensive state examinations
- Development of local comprehensive assessment systems
- Reporting of results
- Professional development
- Staff evaluation
- Access to technical education
- Conditions, practices and resources which include school leadership, staff qualifications and requirements, student support and health services, graduation requirements, instructional practices, curriculum, facilities and a safe, civil and orderly learning environment.

LEA Definition and Accountability

Vermont statute currently does not hold any entity except public schools accountable. A provision in state law, in the case of schools that make insufficient progress in student performance, permits the Commissioner and State Board to adjust supervisory union boundaries or the responsibilities of the superintendency.

Members of the 2003 Vermont legislature plan to introduce a bill to address changes to Vermont's educational governance structure. The Vermont Department of Education will work with the Vermont legislature during the 2003 session and beyond, as necessary, to address the requirement under NCLBA for LEA accountability in the larger restructuring bill.

The legislative effort to explore changes to the governance structure of Vermont's schools is significant and will most likely not be completed during the current session, which may end in late spring. Until there is resolution, Vermont will integrate the definition of AYP into the State Accountability System by continuing to define the role of the LEA as the Supervisory Union/District for the purposes of Title I.

LEA Accountability in the Transition

Unlike most states with large urban areas, Vermont has supervisory unions that - most typically - comprise several town school districts, each of which has a school board and authority to raise taxes to support schools. Concerning accountability until legislative changes occur, Vermont will proceed as follows:

- The calculation of AYP for the LEA will be an aggregate of the school calculations, as required by NCLBA.

- Under state law (16 V.S.A. §165 (b)), the Commissioner makes a determination of AYP at the school building level only; however, the role of the LEA is acknowledged in that consequences for a school not making AYP include adjusting the supervisory union (LEA) boundaries or the responsibilities of the superintendency.
 - All Supervisory Union/Districts in Vermont receive Title I funds; therefore all of them are subject to the consequences in Section 1116.
 - The AYP calculation for the LEA will be tracked and the consequences in Section 1116 will be applied as part of the SEA oversight of the entity that receives, distributes and determines the use of funds under NCLBA.
- Currently all LEAs submit Consolidated Federal Program (CFP) applications which will serve as the basis for the required improvement plans if an LEA does not make AYP. The required plan components should already be addressed in an adequate CFP application.
 - Corrective actions in Section 1116 will be taken, as appropriate, and will be aligned with state law consequences and the responsibilities of the SEA for oversight of the CFP funds and applications.

The LEA will work in partnership with the SEA through the Statewide System of Support and the "pass through" funds and services for school improvement. This will ensure that the action planning required of all schools under state law, and the CFP plans required of all LEAs under NCLBA, will coordinate the available resources for school improvement and the closing of achievement gaps.

Inclusion of all Schools

- 1. Total number of schools receiving public funds from State 368**
- 2. Total number of public schools 310**
If numbers for 1 and 2 are different, please explain.

There are 58 non-public, independent schools in Vermont that serve publicly-funded students. These students are all required to be assessed by the state assessments and, in some cases, their results are included in the accountability determinations for public schools, as appropriate. See Attachment MM

- 3. Total number of public schools receiving Title I funds 219**
- 4. Total number of schools not receiving Title I funds 91**
- 5. Does the state have a definition of a “public school” for accountability purposes? If no, please explain. Yes**
- 6. Is the definition of “public school” for accountability purposes the same as other definitions of “public school” used by the State, e.g., are the school ID codes the same in the State databases? (Y/N) If no, please explain. Yes**

Inclusion of All LEAs

- 1. Total number of LEAs (e.g., public school districts) 60**
- 2. Total number of LEAs receiving Title I funds 60**
- 3. Does the state have a definition of LEA for accountability purposes? Yes, at this time it is the Supervisory Union/District.**
- 4. Is the definition of “public school district” for accountability purposes the same as other definitions of “public school district” used by the State, e.g., are the district ID codes the same in the State databases? (Y/N) If no, please explain. Yes**

Vermont includes all public schools and LEAs in the statewide AYP model as follows:

- **charter schools**
 - **Vermont does not currently have charter schools**
- **alternative schools**
 - **All public alternative schools are included in accountability**
 - **all students in public alternative programs are assigned to a public school for accountability purposes**
- **state schools for the blind/deaf**
 - **Vermont does not currently have any state schools for the blind/deaf**
- **juvenile correction centers, residential centers, etc**
 - **These are not public schools under Vermont's definition of "public school."**
- **schools without testing or other data (e.g., K-2 schools)**
 - **Vermont assigns results of 4th graders on the New Standards Reference Exam to the primary schools the students previously attended. Vermont also includes its Grade 2 Vermont Developmental Reading Assessment in indexes for all schools with Grade 2.**
 - **Page 16 of the Operations Manual for the Vermont School Accountability System Based on Student Performance states: For any school whose only state level assessment is the Vermont Developmental Reading Assessment, "pairing" or "sharing" of data with the school into which they feed will be required.**
- **exceptionally small schools**
 - **All schools are included in accountability and those with fewer than 30 students in two years of assessment results participate in the small school review**

Evidence:

Attachment A: 16 V.S.A. §165(b) and (c)

Attachment B: Rules for Vermont's School Accountability System Based on Student Performance, September 2000

Attachment C: Vermont School Quality Standards

Attachment D: Operations Manual for the Vermont School Accountability System Based on Student Performance, July 2000

Attachment E: 16 V.S.A. §261a

Attachment F: 16 V.S.A. §563

1.3 Does the State have, at a minimum, a definition of *basic*, *proficient* and *advanced* student achievement levels in reading/language arts and mathematics?

Rule 2511 of the *Rules for Vermont's School Accountability System Based on Student Performance* states that the purpose of the rules is to establish a framework for identifying those public schools most in need of improving student performance in relation to the standards set forth in *Vermont's Framework of Standards and Learning Opportunities*.

Vermont received approval under the previous authorization of ESEA (IASA) for both its standards and its current assessments. Vermont's achievement level definitions are consistent with basic, proficient, and advanced in reading/language arts and mathematics. The current Vermont achievement levels are: Achieves the Standard with Honors (advanced); Achieves the Standard (proficient), and three levels below the standard (basic), Nearly Achieves the Standard, Below the Standard and Little Evidence of Achievement.

The New Standards Reference Examinations (NSRE) in mathematics and English/language arts (ELA) in Grades 4, 8 and 10 and the Vermont Developmental Reading Assessment (VT-DRA) at Grade 2 will be the initial basis for accountability. These assessments were approved under the previous authorization (1997) as valid and aligned to state standards.

At this time, Vermont expects to maintain its five performance levels to describe student performance across all existing and new assessments that are developed to meet NCLBA requirements. Standards will be set on the assessments to align with those definitions.

There are three types of Alternate Assessment in Vermont's system: Adapted or out-of level, Modified and Lifeskills. Lifeskills students are the only ones who are assessed using alternate achievement standards based on their progress in meeting their education program as outlined in their IEP and referenced to *Vermont's Framework of Standards and Learning Opportunities*. Currently, these students comprise approximately .7 - .9 percent of all assessed students in Vermont. No student currently taking an out-of-level assessment is determined to have met the standard.

Vermont agrees to count students who take out of level tests as not proficient against standards, but will include them as participants in the participation rate calculation until such time as there as further IDEA or U.S. DOE guidance requires a change. In the meantime, Vermont will continue the development of new assessments through the New England Compact, which will be more inclusive of all students and will provide better information about grade level performance of all students. With out of level students included in this manner, approximately 20% of Vermont schools will not make AYP.

Vermont's performance on the National Assessment of Educational Progress (NAEP) and on the SAT9 items embedded in the NSRE indicates that Vermont outperforms most other states on academic measures.

Table 1: Assessments Used for 2002-2003 AYP Decision

Test	Content	Grade	Type	Alternates	Native Language
New Standards Reference Exam (NSRE) in Math	Mathematics	4, 8 and 10	Criterion Referenced Test	Lifeskills; Out of Level NSRE; Stanford Diagnostic	Spanish NSRE Pilot: 4 th grade simplified language NSRE
VT- Developmental Reading Assessment	Reading	2	Criterion Referenced Test	Lifeskills	
New Standards Reference Exam (NSRE) in English language arts	Reading/English Language Arts	4, 8 and 10	Criterion Referenced Test	Lifeskills; Out of Level NSRE; Stanford Diagnostic	Spanish NSRE

Table 2: Introduction and Revision of Assessments

Assessment Content Area	Grade Level	New/Revised	Year
Math and Reading	3, 5, 6 and 7	New	2005-2006
Math and ELA	4, 8 and 10/11	Possibly New	2005-2006

Evidence:

Attachment G: June 1997 letter to Secretary Tirozzi from Commissioner Hull

Attachment H: January 2001 letter from Secretary Cohen to Commissioner Wolk

Attachment B: Rules for Vermont's School Accountability System Based on Student Performance, September 2000

1.4 How does the State provide accountability and adequate yearly progress decisions and information in a timely manner?

Vermont administers the New Standards Reference Examinations (NSREs) in mathematics and reading/English language arts from mid-March to mid-April; the VT-Developmental Reading Assessment is administered in May. In 2003, we anticipate that we will receive results from Harcourt Educational Measurement for the New Standards exam in July and we will make every effort to make AYP determinations before the beginning of the school year.

We acknowledge that this is a very challenging timeline, but have limited options given that the 2003 administration window had already been established and that a new form of the test is being used this year. We will account for the necessity to make AYP determinations before the beginning of the school year as we implement the NSREs in future years and develop and implement the new assessments at Grades 3, 5, 6 and 7.

Vermont has worked diligently to ensure that assessment and accountability information is provided to schools in the most accurate and timely manner possible. All data used to calculate the school indexes undergo several stages of validation, for both assessment and accountability participation, to ensure that accurate accountability decisions are made. This process requires a minimum of two months. Vermont also has an appeals process for schools to offer evidence to counter identification or the accuracy of an index (or any other data that contribute to identification), which could take another 4-6 weeks.

Vermont plans to make preliminary determinations of AYP for those schools potentially affected by choice, supplemental services or corrective action requirements prior to the more extensive validation process. This will allow schools to begin communication with parents and/or initiate corrective actions.

A recent communication from Harcourt has indicated that we will have results from the New Standards Reference Examinations in mid-July. These assessment results need to be verified and then participation results need validation before we can issue final accountability results. We will begin the process as soon as possible after the results are received. We will conclude the process within the shortest possible timeline, reporting final accountability results for all schools before or soon after the beginning of the 2003-2004 school year.

For this year only, the impact of any delay in final accountability determinations beyond the beginning of the school year for Title I schools needing to inform parents of supplemental services or choice is virtually nonexistent. The Title I schools with choice or supplemental services will remain the same in 2003-2004 as in 2002-2003 with the possible addition of two new Title I schools entering school improvement for the first time, with the potential for choice only. There are no Title I schools at a point where the 2003 AYP determination will add supplemental services to their requirements. Since it takes two years of making AYP before the schools can exit school improvement, even if they make AYP, the currently identified Title I schools will continue to have the supplemental services and choice requirements, as applicable.

Title I schools currently in school improvement will be told they must inform parents of supplemental services and choice, as applicable, before the beginning of the 2003-2004 school year. In the case of the two new Title I schools, there are not schools of comparable grade span within the LEA to which students can transfer. These schools will be required to inform parents about choice before the beginning of the 2003-2004 school year, as outlined in the U.S. DOE choice guidance in anticipation of their possible identification. As soon as we receive the assessment results from Harcourt, we will validate these two schools to ensure that they have the earliest complete information for parents.

Rule 2550 will need to be changed to reflect the annual AYP determination/report as well as the addition of preliminary determinations and the process and timeframe for making final determinations.

Evidence:

Attachment B: Rules for Vermont's School Accountability System Based on Student Performance, September 2000

Attachment D: Operations Manual for the Vermont School Accountability System Based on Student Performance, July 2000

Attachment I: Vermont Quality Assurance Procedures

Attachment J: Statewide Assessment Meeting Folder, January 2003

Attachment K: Memo on Test Security for Spring 2002 VT-Developmental Reading Assessment

Attachment L: Memo on Update/Calibration for Spring 2002 VT-Developmental Reading Assessment

Attachment M: Assessment Participation Verification Report (Sample)

1.5 Does the State Accountability System produce an annual State Report Card?

Vermont has produced an on-line Vermont School Report since 1998. It currently includes information for all schools on student achievement at each proficiency level on the State academic assessments and the most recent three-year trend in student achievement in each subject area, and for each grade level, for the required assessments.

Results from the current accountability system, including the number and names of each school identified for school improvement under NCLBA Section 1116, are also posted on the Department's website.

The Department provides all subgroup disaggregations based on valid cell sizes for reporting, as well as participation information (students not tested) for all students and for subgroups, based again on valid cell sizes for reporting.

Information on graduation rates and other indicators used for accountability will also be added to the website as those are developed.

Once the revised Accountability System has been approved, new baseline information will be posted to provide the comparison between the actual achievement levels of each student subgroup and the State's annual measurable objectives for each group of students.

The Department will also add the required information about Teacher Quality to the website. A report on the percentage of "highly qualified" teachers in the core subject areas for 2002-2003 school year will be submitted to the USDE on September 30, 2003. This will establish the state's baseline.

The steps we are taking in order to report on the professional qualifications of teachers in Vermont, the percentage of teachers who are not fully licensed, and the percentage of classes not taught by highly qualified teachers, in the aggregate and disaggregated by poverty are as follows:

Establish Vermont's definition of Highly Qualified Teachers

- ◆ **April 2003 – Complete work on definition of "highly qualified" teachers. Proposed model was presented to the State Board of Education and Vermont's Standards Board on April 15, 2003. Vermont's definition will include the criteria required in NCLBA.**
- ◆ **May 20, 2003– Vermont's State Board of Education will be asked to vote to adopt the state's definition of "highly qualified" teachers.**

Collect Personnel Data

- ◆ **February 2003 through April 2003 - Identify the data items, definitions, and process for collecting data on school personnel assignments. Develop a program**

and electronic survey for collecting data on educators' teaching assignments by class and school.

- ◆ May 1- June 1, 2003 – Send personnel survey to school districts and supervisory unions to collect information on teaching assignments.
- ◆ June through July 2003 – Clean data and match the personnel survey data with the educator database and school poverty data.
- ◆ October 2003 – Institute school personnel data collection as an annual requirement.

Enhance Vermont's Educator Database and Report Baseline Data

- ◆ May 2003 - Expand the current educator database to include data elements of Vermont's model for "highly qualified" teachers.
- ◆ May through June 2003 - Review educator paper files and other sources to collect data on "highly qualified" criteria.
- ◆ June through July 2003 – Match the personnel survey data with the educator database. Determine who is highly qualified based on available data. Send "Vermont's Content Knowledge Rubric" to veteran educators who are not found to be "highly qualified" based on available data.

August through September 2003 – Analyze the responses and documentation of educators who complete the rubric. Finalize the determination of "highly qualified" teachers in the core subject areas. Inform school districts and supervisory unions. Compute the percentage of classes not taught by highly qualified teachers, in the aggregate and disaggregated by high poverty compared with low poverty schools in the Vermont.

- ◆ September 30, 2003 – Submit Vermont's report on teachers' qualifications to the USDE. This will represent the state's baseline.

Rule 2550 currently describes the elements of public reporting of accountability information and will be modified to include these requirements.

Initially, Vermont will ensure that all required elements of the State Report Card are accessible on our website and available for LEAs and schools to incorporate into their required reporting. Currently, we provide data to the Center for Rural Studies at the University of Vermont and they format and maintain the Vermont School Report. Our long-term plan is to redesign our web-based reports into a comprehensive and coordinated system that runs off our databases and can provide specific reports differentiated by user need. We would also incorporate our current graphing tool (*Vermont School Improvement Guide*) that is part of our action planning support for schools and districts.

As regards evidence that the State Report Card is accessible in major languages, there is no single language, other than English, that can be described as a language of a major population in Vermont.

Top 5 Non-English Language Backgrounds (NELB) Groups in Vermont

Total Student Enrollment in Vermont = 99,978

Linguistic Background	Number NELB	Percent	Number LEP
Bosnian/Serbo-Croatian	441	.44	310
Spanish	321	.32	142
Vietnamese	249	.24	168
French	221	.22	67
Chinese	202	.20	101

Evidence:

Attachment B: Rules for Vermont's School Accountability System Based on Student Performance, September 2000

The School Report is available at <http://www.state.vt.us/educ>

Attachment N: Vermont Department of Education School Report (Sample)

Attachment O: Vermont School Improvement Guide (Sample)

Attachment P: Accountability Review for Priority Schools Receiving Technical Assistance Report, October 2002

1.6 How does the State Accountability System include rewards and sanctions for public schools and LEAs?

Vermont law, 16 V.S.A §165 (b) has consequences for all schools:

- technical assistance,
- assuming administrative control to the extent necessary to correct deficiencies;
- adjusting the supervisory union boundaries or the responsibilities of the superintendency;
- closing the school and requiring the school district to pay tuition to another public school or approved independent school.

We have reviewed and aligned the consequences in NCLBA for Title I schools with the consequences in state law for schools. We have created a transition document to guide schools and LEAs as we make the transition from the pre-NCLBA system to system we have outlined in this document. See Attachment LL.

Rules 2560 and 2560.2 currently describe sanctions for schools and will be modified to include rewards and to address LEA sanctions and rewards; the latter depend in part on the outcome of the legislative activity.

Evidence:

Attachment A: 16 V.S.A. §165(b) and (c)

Attachment B: Rules for Vermont's School Accountability System Based on Student Performance, September 2000

Attachment LL: School Improvement Status: Transition from Current System to Revised System

Attachment NN: Alignment of Principles to Current Rules for Vermont School Accountability System Based on Student Performance

Attachment OO: Rules for Vermont's School Accountability System Based on Student Performance, September 2000, first draft of revisions

PRINCIPLE 2. All students are included in the State Accountability System.

2.1 How does the State Accountability System include all students in the State?

2.2 How does the State define “full academic year” for identifying students in AYP decisions?

2.3 How does the State Accountability System determine which students have attended the same public school and/or LEA for a full academic year?

Vermont Rule 2530 currently states:

"Schools shall account for all students. Students not included are those with medical excuses, family emergency or student crisis, and students who enroll in the school on or after the first day of testing. In addition, if, as a result of a suspension or expulsion, a student is not available to take a complete assessment, the student will not be included in accountability results, as described in the Accountability Operations Manual.

"The State Board shall include the results of alternate assessments in the accountability system for eligible students with Individual Education Plans, 504 Plans, or limited English proficiency, when such assessments are developed and when they meet accepted technical standards. Specific details concerning the inclusion of alternate assessments in the accountability system shall be described in the Accountability Operations Manual.

"Any student who does not take an assessment, including alternate assessments, without an approved exemption or excuse, shall be assigned the point value (0) for the lowest performance level, Little or No Evidence of Achieving the Standard. The Accountability Operations Manual shall describe the criteria and process for determining exemptions from regular assessments and valid excuses from all assessments."

This rule will be modified to include all students enrolled in school on the day before the official test window in the denominator for participation calculation. All students, except those with medical or student/family crisis exemptions will be included in the achievement indexes with a score of 0-500.

All students in independent schools at public expense are required to participate in the state assessments. These results are publicly reported.

Section 1120 of Title I requires the LEA to include how services will be academically assessed and how the results of that assessment will be used to improve those services in the "timely and meaningful" consultation of LEA with appropriate private (independent) school officials during the design and development of Title I services for private (independent) schools. This is an LEA, not a state responsibility; the state does require assurances from the LEA and monitors to ensure that private school students are receiving equitable services and that "timely and meaningful" consultation is occurring.

Independent schools are not part of the single statewide system of accountability for public schools. If these schools have publicly funded students, they are assessed by state assessments. The independent schools that participate in Title I in Vermont are more often parochial schools. Therefore, these students are not publicly funded, and the LEA and the school determine other appropriate assessment measures. Their accountability comes from the LEA and SEA monitoring of services and student outcomes through Title I.

As recommended by the Policy Advisory Committee (PAC), Vermont will define the full academic year as of October 1 of the school year in which the assessments are administered. Only those students who are enrolled in the school as of October 1 will have their results included in the Accountability System. October 1 was selected because this is the official enrollment collection for the school year.

The definition of "full academic year" will be reflected in a change to Rule 2530 as well as to the Operations Manual.

All students who were in the same school for the full academic year will be counted in the school's AYP determination.

All students who were in the same LEA for the full academic year will be counted in the LEA's AYP determination.

All students who have been enrolled in public schools in the state for the full academic year will be counted in the state's AYP determination.

Because October 1 is the official enrollment date for the state, student results can be appropriately assigned, using the October 1 Student Census and Demographic Update, **in which all public schools are required to participate under 16 V.S.A. § 212 (9).**

Evidence:

Attachment B: Rules for Vermont's School Accountability System Based on Student Performance, September 2000

Attachment Q: 16 V.S.A. §166 (g)

Attachment R: Policy Advisory Committee memo, November 2001

Attachment S: October 1, Student Census and Demographic Update

PRINCIPLE 3. State definition of AYP is based on expectations for growth in student achievement that is continuous and substantial, such that all students are proficient in reading/language arts and mathematics no later than 2013-2014.

- 3.1 How does the State's definition of adequate yearly progress require all students to be proficient in reading/language arts and mathematics by the 2013-2014 academic year?
- 3.2 How does the State Accountability System determine whether each student subgroup, public school and LEA makes AYP?

To ensure that our Accountability System was as reliable as possible, Vermont made the following choices when we initially developed the system in 1997-2000:

- Used an Index, since school averages based on an index are more reliable than those based on pass/fail judgments
- Required schools to meet one goal combined over all tests rather than requiring them to meet a goal for each of the tests (or reporting areas). The fewer the decisions made, the greater the consistency of the decisions
- Required schools to meet one goal for all students in the school rather than requiring them to meet goals for several subgroups. One decision made on a large group of students is more reliable than several decisions made on smaller groups. The

weighting of points was designed to ensure that schools could not meet goal without moving virtually all students out of performance levels below the standard.

- Averaged data over two years, since results aggregated over twice as many students are more reliable than those of just one year

Our plan is to maintain the basic structure of the index system while incorporating the NCLBA requirements in a manner that works with reliability and validity because Vermont has more than 50 students in only 27 percent of its tested grades at the school level.

Vermont will modify Rule 2512 to define AYP as the progress necessary to move from baselines established in 2002 on 2001 and 2002 data to 100 percent proficiency by 2013-2014. Rules 2520 and 2540 would be amended to describe the modifications to our use of the Index.

We have separated the combined index into two content specific indexes (mathematics and reading/language arts), as required in Principle 8.1 to ensure that we are making separate determinations of AYP for each content area. Content specific indexes will maintain equal weighting of basic and analytical reporting areas (for example, in mathematics NSRE Skills is 50 percent of the index and Concepts and Problem Solving are 50 percent)

Student results on the New Standards Reference Examination in English language arts and the VT-Developmental Reading Assessment will be aggregated into the ELA Achievement Index and the New Standards Reference Examination in mathematics will form the Mathematics Achievement Index.

- Vermont will establish grade span starting points that will be equal to the percentage of students who are proficient or higher in the 20th percentile school in the state as required by the NCLBA.
- Indexes will aggregate two years of student results in each annual decision (rolling average) until 2005-2006 when additional assessments will provide more data.
- Points will be assigned consistent with the Table in A2 and "0" points will be assigned for students present in school or LEA on October 1st without a medical/crisis exemption who do not participate in assessment.

An annual determination of student performance in relation to the applicable content/grade span AMO will be made for all students and for all student subgroups. This will be done in a manner to ensure a valid and reliable decision for all schools and a decision that results in the right schools receiving technical assistance.

Index compared to 100% proficient. Provide impact data or scenarios of how VT's proposed index equates to 100% proficient from the starting points to 2013-14. Or provide an explanation of how VT's unique index system allows for 100% proficiency.

There are at least two ways to understand the relationship between the index system and the percent proficient required by the NCLBA. Since the relationship is not a direct one the translation of an index number to percent proficient requires the estimation of the percentage represented by the index at a given point in time. The first translation of this relationship presented in Attachment 1 is a simple linear transformation of the percentage proficient that is backed down proportionately from 100 percent proficient to each starting point in each of the groups of schools formed by grade spans. This estimate is computed for each tested area (reading and mathematics) and for the total state as well as each of the grade spans. There are 24 such analyses presented. The second method, presented in Attachment 2, is an estimate based upon simulations computed with actual Vermont data that indicate the likelihood that the system will behave as estimated in the first set of simulations. We note that the impact of misclassification of schools based on the index values is estimated to be at about 2 percent. Note: This discussion also addresses the potential misclassification of schools under the Safe Harbor provision.

Attachment ZZ.1: *PercentProficientSim.xls*

Bud Meyers

May 5, 2003

Attachment ZZ.2: *Relationship of Vermont Accountability Index to Percent Proficient*

Brian Gong and Charlie DePascale, Center for Assessment

Draft revised: May 7, 2003

Vermont not only wants to ensure that no schools are wrongly identified but also that very small schools that should be identified are not overlooked because of their small size. In order to accomplish this we intend to devise a system that combines:

- The methodology of the confidence interval approach (*Making Valid and Reliable Decisions in Determining Adequately Yearly Progress*, CCSSO, p. 62-65) with
- An approach to safe harbor (improvement) for all student and subgroup analysis utilizing an approach developed by North Dakota as described in: "North Dakota's Approach to 'Minimum N'" by Richard Hill, unpublished personal communication December 30, 2002,
- A review of very small schools.

Confidence Intervals

A confidence interval is an estimate of how accurate a given score is. Every school has a theoretical "true" score. But since we only test a sample of students in that school we are only estimating what the true score actually is. A confidence interval is a range of scores, within which we are more or less certain the "true score" lies. If we go outside that range, we risk making a mistake in classifying a school as a low or high performing school. The size of a confidence interval is determined by the

number of students in the school, and how certain we want to be that we are not making a mistake. A school with a small number of students will have a large confidence interval, while a school with a large number of students will have a smaller confidence interval.

Instead of the alpha .001 proposed at the April 17th meeting, Vermont will use .01 for each decision. All modeling referred to in this document uses .01 for each decision.

Confidence Intervals:

- Will be calculated (plus and minus) around the Annual Measurable Objective (AMO) according to a table that takes into account the AMO and the number of students
- Will be initially set at .01 to ensure a low initial risk for misidentification
- Will be reviewed annually and can be narrowed in later years, as appropriate. As we gain more experience with the system, we might accept a "narrower" or smaller confidence interval and be certain of our determination

Decisions about AYP will be made as follows:

Vermont will use a minimum group size equivalent to 40 for one year for all AYP groups. This removes any concerns about civil rights that were raised when we proposed a different "n" size for students with disabilities than for other AYP groups. With this group size and a .01 confidence interval, modeling indicates that we will identify approximately 35 schools for not making AYP in one or more of the AYP groups. In addition, approximately 10 schools will be identified because of an academic indicator.

- **Schools and subgroups of 40 (80 or more students in two-year aggregate) whose entire confidence interval is above the AMO have made AYP.**
- **Schools and subgroups of 40 (80 or more students in two-year aggregate) whose confidence interval includes the AMO have made AYP**
- **Schools and subgroups of 40 (80 or more students in two-year aggregate) and whose entire confidence interval is below the AMO have not made AYP unless:**
- **With most recent year of results, their entire confidence interval is above the AMO or,**
- **They meet safe harbor requirements**
- **No determinations of subgroup AYP will be made for subgroups with fewer than 40 students (80 students in two-years), subgroup accountability will be reviewed as part of the Small School Review A or B; over time the focus on small subgroup review will replace small school review, as more schools increase the numbers of students assessed.**

A school needs two consecutive years of not making AYP in the same content for any AYP Group to be identified for school improvement.

Small School Review

Vermont will conduct specific reviews at the all student level for schools that are below the minimum “n.” and would not otherwise be reviewed to increase the reliability and validity of the decisions made in our Accountability System. Small School Review A will ensure that at the very small school level, we can identify false positives.

All schools with an “n” of less than 30 students (over two years) in the all student AYP group will receive a small school review, regardless of whether they meet AYP or not on the achievement index(es). There are approximately 30 schools that will need a small school review for mathematics and an additional 20 that will need the review for both ELA and mathematics. Please note: Any of these 50 schools could be added to the list of schools not making AYP at the conclusion of the review.

In addition, all schools with an average of between 15 and 39 students per year in a consecutive two-year span, whose index and complete confidence band is below the AMO, will also be reviewed to address false negatives. This is Small School Review B. Modeling shows 4-5 schools will be included in Small School Review B and they are likely to be added to the list not making AYP.

A final determination of AYP will only be made after this qualitative review of all available student achievement results for schools in either of these two categories. We anticipate that 50-55 schools will participate in the small school review.

These reviews are necessary to ensure that all schools, regardless of their size, are included in a valid and reliable manner, in the accountability system at the level of “All Students.” Subgroups, of course, are even smaller in these schools; however, the small school review will permit a closer review of students with disabilities, etc.

The protocol for these reviews will ensure that the process is consistently applied to maintain the validity and reliability of the system and to ensure that decisions about schools are based primarily on student performance. By applying this review to all small schools under 30, those that made AYP on the state assessments and those that did not, we may identify schools for technical assistance that might have been overlooked by considering ONLY the student performance data from the state assessments.

Because the small school review is part of the determination of AYP, a decision about the school must still be based primarily on information from academic assessments. The review allows the opportunity for a small school to present more information about whether students in all grades in the school are meeting the standards in mathematics and/or reading/language arts that will either confirm or not confirm the state assessment results. Each school will have separate determinations made about whether they are making AYP in mathematics and in reading/language arts; because of the inclusion of the VT-DRA at Grade 2, some

schools will have different numbers of students in math versus reading/language arts. This means that some schools may only qualify for a small school review in mathematics.

The Small School Review is not about scoring or rescoring student work. It will look at summative data about student achievement in relation to the standards. The types of additional student achievement data that a school could present in a small school review include:

- **Any norm-referenced test that is reasonably (60 percent) aligned to Vermont Standards**
- **Vermont mathematics portfolios and Vermont writing portfolios that have already been scored by teachers who have met calibration requirements**
- **VISMT Math Assessment at Grades 2 and 6**
- **Primary Observation Survey**
- **Degrees of Reading Power**
- **Kindergarten Observation Survey**
- **Other assessments approved through the Statewide Improvement Grant**
- **Other standards based assessment tools used by the district or school**
- **Lifeskills assessments**
- **Review of student IEP progress aligned to standards**

Results will be considered for students as a whole in the school and the performance of subgroups will also be carefully considered. Although in very small schools, the subgroups will be even smaller, by looking across all grades and all results in the school, more information about subgroup performance will also be available to inform the final determination of AYP for the school.

Schools eligible for the small school review can be "estimated" based on the numbers of students tested in the most recent two years, which will allow schools to collect and prepare the additional materials during the school year. These materials will be collected in April-May. For 2003, this collection will occur later due to the recent negotiations with the U.S. Department of Education.

A school improvement coordinator will contact both the superintendent and the principal to remind them of what student achievement results can be used, of the documentation that must be available to submit for review and to make an appointment for a school visit to collect the information. The school improvement coordinator will visit the school to examine the evidence and ensure that the necessary information is available for submission. This process will be consistently applied to all small schools to ensure comparability of treatment.

A Collection/Assurance Form for each assessment will be required. On this form, the following information will be documented:

- **Standards addressed by the assessment**

- Evidence of validity and reliability exists for the assessment
- Did all students participate?
 - Reasons why students did not take assessment
 - Were there alternate assessments given?
- Conditions under which students participated in the assessment
 - On demand or over time
 - What accommodations were allowed?
 - Was there teacher assistance?
- Who scored the assessment?
- Percentage of students meeting the standard on the assessment
- Signed assurance by both Superintendent and Principal attesting to the accuracy of the information

At the time of the visit, Department staff will review the collection form for completeness and document any additional information that the principal thinks is helpful. The team will collect the cover sheets and an example of any assessment that is not on the list of known assessments.

The small school review will be conducted when the results of the most recent year's assessments and AYP calculations are available. The review process will be scheduled in August within a 2-3 week period. After a final review of all evidence by a Department panel, which will include School Improvement, Accountability and Content Area experts, a recommendation will be made to the Commissioner within the prescribed time period. This recommendation will be based on whether the additional evidence indicates that students are meeting or are not meeting the standard at the level required by the current Annual Measurable Objective (AMO) in the relevant content area.

Safe Harbor

At the point that the decision is made that a school does not meet the AMO, the school can still demonstrate that it has met "safe harbor." Safe harbor will be determined as follows:

- A school's current year academic index will be used to identify their performance index (P1).
- Their Safe Harbor target (T) will be equal to their performance index in the previous year multiplied by 0.10. $T2 = P1 * (0.10)$.

As indicated earlier, simulations with Vermont data indicate that while there is not a 1:1 correspondence between the index scores and percent proficient, the level of misclassification is less than 3 percent. We expect that schools and groups that make safe harbor under these conditions will have advanced at least 10 percent of their students to the proficiency level.

In 2003, the safe harbor decision will look for a 10% change in the index without the use of a confidence interval. Previous modeling indicates that, with no confidence interval, it is less likely that schools that do not meet the AMO can meet safe harbor. This means that most of the 35 schools will remain as not making AYP.

Finally, the two-tiered small school review has the potential to identify some of the approximately 55 schools that will need to participate in math and/or ELA as not having made AYP.

This means that there is accountability for all schools in Vermont for the all student AYP group, including those that are below the minimum “n.” Vermont will, with this method, identify at least 20% of its schools within two years.

Schools of sufficient “n” size which do not make AYP on either math and/or ELA index for one or more of the AYP groups	35
Schools of sufficient “n” size which do not meet academic indicator for one or more of the AYP groups	5-10
Schools that participate in a small school review and are determined to not meet AYP based on this review	15-20
Total Number of Schools	55-65

Evidence:

Attachment B: Rules for Vermont's School Accountability System Based on Student Performance, September 2000

Attachment D: Operations Manual for the Vermont School Accountability System Based on Student Performance, July 2000

Attachment T: Draft Recommendations for the Design of a School Accountability System for Vermont, November 9, 1999, Brian Gong and Rich Hill

Attachment U: Examining the Reliability of Accountability Systems, a paper presented at the 2002 Annual Conference of the American Educational Research Association, April 3, 2002, Rich Hill

3.2a How does the State Accountability System determine whether each student subgroup, public school and LEA makes AYP?

3.2b What are the State's annual measurable objectives for determining adequate yearly progress

3.2c What are the State's intermediate goals for determining adequate yearly progress

Vermont will modify Rule 2520 C and establish starting points on the Index by using the school(s) with 20% of the enrollment by grade spans, rather than by a single starting point for all schools, because schools' starting points should be established with the assessment data that are relevant to their school. By using grade span starting points, the performance on a 10th grade assessment will not have an impact on a school that does not have a 10th grade. Our Policy Advisory Committee (PAC) made this recommendation as being fair to schools.

When we modeled data, the proportion of schools below the grade span starting points was more comparable across each grade span grouping than when we used a single starting point for all schools. In the past, we had established statewide "average" indexes by grade span.

The same grade span starting points will be applied to subgroups to make a determination of AYP using the methodology described in A3.

Rule 2540, which established the criteria by which schools would be identified, will be modified to reflect the required structure of AYP (starting point, AMOs, and Intermediate Goals).

Vermont will maintain the AMOs at the Index starting point levels for the 2002-2003 and the 2003-2004 determination of AYP. This is within the choices available under the statute and is fair given that we were not able to inform schools (based on the timing of the approval of our system) of their starting points reasonably ahead of the administration of the 2003 assessments. The AMO will be increased in 2004-2005, as required, to match the Intermediate Goal, and will then be held steady in 2005-2006 and 2006-2007 and raised in 2007-2008 to meet the Intermediate Goal.

After the initial required increase in three years (2004-2005), PAC recommended that Vermont raise its Intermediate Goals every three years. Intermediate Goals will occur in 2004-2005, 2007-2008, and 2010-2011. AMOs will remain steady within Intermediate Goals. The final goal of 100 percent must be met in 2013-2014. By not requiring more frequent increases, schools will have the longest possible time initially to implement new strategies for improving student performance. This is especially critical to ensure that strategies based on scientific research are fully implemented in order to close achievement gaps for the lowest performing students.

LEA starting points, AMOs and IGs are calculated in the same manner as school level starting points, AMOs and IGs. See Tables that follow.

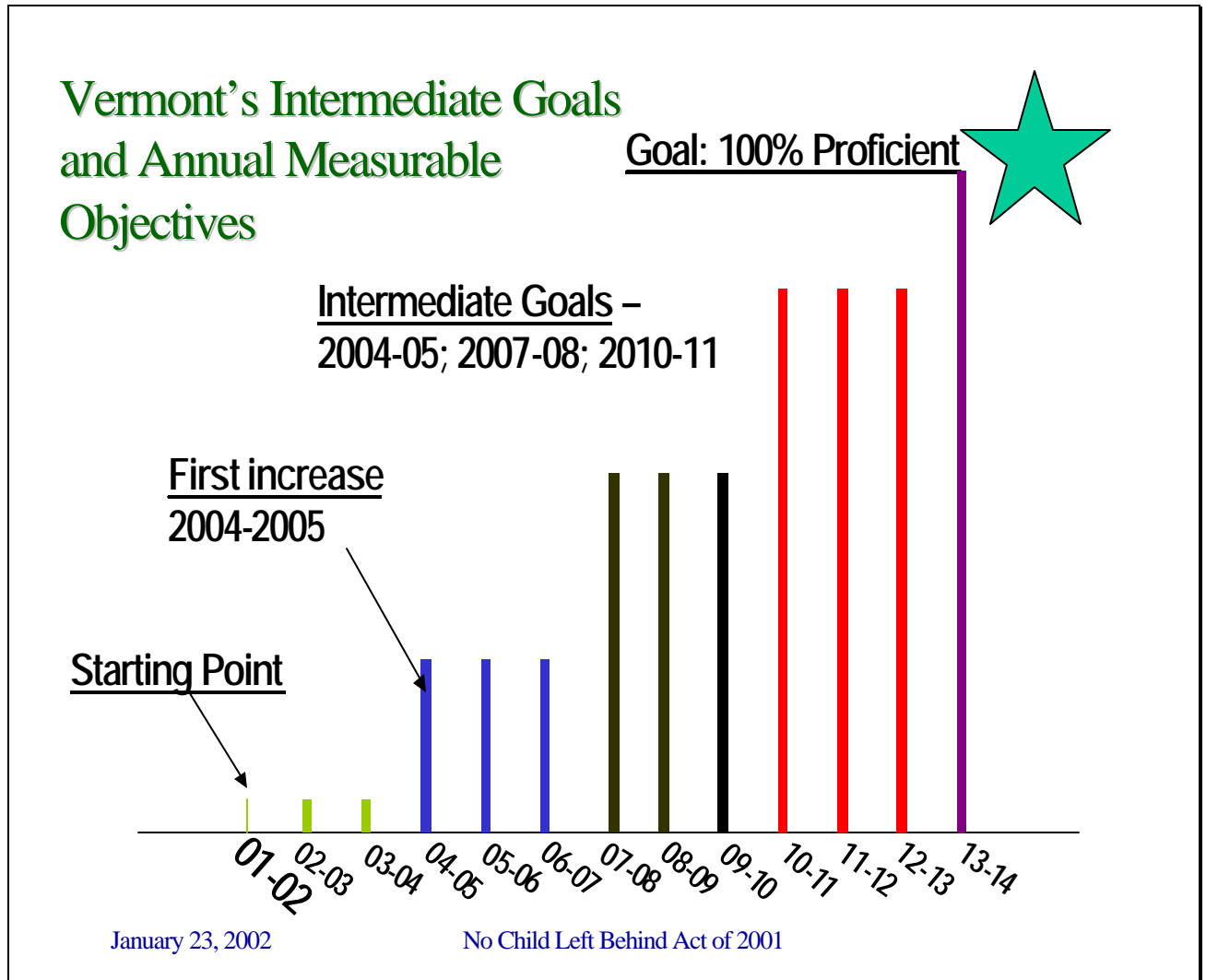


Table 4a. School Starting Points and Annual Measurable Objectives (Intermediate Goals in Bold)

	Grade Span	Start Pt.	03 AMO	04 AMO	05 AMO	06 AMO	07 AMO	08 AMO	09 AMO	10 AMO	11 AMO	12 AMO	13 AMO	14 AMO
Math	2, 4	314	314	314	361	361	361	408	408	408	455	455	455	500
ELA	2, 4	385	385	385	414	414	414	443	443	443	472	472	472	500
Math	8	287	287	287	341	341	341	395	395	395	449	449	449	500
ELA	8	342	342	342	382	382	382	422	422	422	462	462	462	500
Math	2, 4, 8, 10	293	293	293	345	345	345	397	397	397	449	449	449	500
ELA	2, 4, 8, 10	380	380	380	410	410	410	440	440	440	470	470	470	500
Math	8, 10	277	277	277	333	333	333	389	389	389	445	445	445	500
ELA	8, 10	339	339	339	380	380	380	421	421	421	462	462	462	500
Math	10	268	268	268	326	326	326	384	384	384	442	442	442	500
ELA	10	345	345	345	384	384	384	423	423	423	462	462	462	500
Math	2, 4, 8	306	306	306	355	355	355	404	404	404	453	453	453	500
ELA	2, 4, 8	381	381	381	411	411	411	441	441	441	471	471	471	500

Table 4b. LEA (SU/D) Starting Points and Annual Measurable Objectives (Intermediate Goals in Bold)

	Grade Span	Start Pt.	03 AMO	04 AMO	05 AMO	06 AMO	07 AMO	08 AMO	09 AMO	10 AMO	11 AMO	12 AMO	13 AMO	14 AMO
Math	2, 4, 8	309	309	309	357	357	357	405	405	405	453	453	453	500
ELA	2, 4, 8	375	375	375	407	407	407	439	439	439	471	471	471	500
Math	2, 4, 8, 10	303	303	303	353	353	353	403	403	403	453	453	453	500
ELA	2, 4, 8, 10	373	373	373	405	405	405	437	437	437	469	469	469	500

Evidence:

Attachment B: Rules for Vermont's School Accountability System Based on Student Performance, September 2000

PRINCIPLE 4. State makes annual decisions about the achievement of all public schools and LEAs

4.1 How does the State Accountability System make an annual determination of whether each public school and LEA in the State made AYP?

Vermont proposes legislative changes from determining AYP decisions biennially to annual by July 17th. Provide evidence that this change is on track

The following is the text of the bill:

BILL AS INTRODUCED 2003-2004 - S.185

AN ACT RELATING TO COMPLIANCE WITH THE NO CHILD LEFT BEHIND ACT

Sec. 2. COMPLIANCE WITH FEDERAL REQUIREMENTS; MEASURING ADEQUATE YEARLY PROGRESS TOWARD ACHIEVING STATE STANDARDS; CONSEQUENCES

16 V.S.A. § 165 authorizes the commissioner of education to determine how well schools and students are meeting state standards every two years and to impose certain consequences if schools are failing to meet standards after specific time periods. Notwithstanding the provisions of that section, in order to comply with the provisions of Public Law 107-110, known as the No Child Left Behind Act of 2001, during school years 2003-2004 and 2004-2005, the commissioner is authorized to determine whether schools are meeting state standards annually and the state board of education is authorized to impose consequences allowed in state law and required by the Act within the time frame required in the Act. It is the intent of the general assembly to continue to study the provisions of the federal law and to seek guidance from the federal government in order to determine permanent changes to Title 16 that will be necessary to comply with federal law.

Current Status: The Senate has approved this bill. Dr. Meyers gave what we expect was his final testimony on the bill on May 8. We anticipate favorable House action before the - conclusion of the 2003 session.

Vermont administers the New Standards Reference Examinations (NSREs) in mathematics and reading/English language arts from mid-March to mid-April; the VT-Developmental Reading Assessment is administered in May. In 2003, we anticipate that we will receive results from Harcourt Educational Measurement for the New Standards exam in July and we will make every effort to make AYP determinations before the beginning of the school year.

We acknowledge that this is a very challenging timeline, but have limited options given that the 2003 administration window had already been established and that a new form of the test is being used this year. We will account for the necessity to make AYP determinations before the beginning of the school year as we implement the NSREs in future years and develop and implement the new assessments at Grades 3, 5, 6 and 7.

Vermont has worked diligently to ensure that assessment and accountability information is provided to schools in the most accurate and timely manner possible. All data used to calculate the school indexes undergo several stages of validation, for both assessment and accountability participation, to ensure that accurate accountability decisions are made. This process requires a minimum of two months. Vermont also has an appeals process for schools to offer evidence to counter identification or the accuracy of an index (or any other data that contribute to identification), which could take another 4-6 weeks.

Vermont plans to make preliminary determinations of AYP for those schools potentially affected by choice, supplemental services or corrective action requirements prior to the more extensive validation process. This will allow schools to begin communication with parents and/or initiate corrective actions.

A recent communication from Harcourt has indicated that we will have results from the New Standards Reference Examinations in mid-July. These assessment results need to be verified and then participation results need validation before we can issue final accountability results. We will begin the process as soon as possible after the results are received. We will conclude the process within the shortest possible timeline, reporting final accountability results for all schools before or soon after the beginning of the 2003-2004 school year.

For this year only, the impact of any delay in final accountability determinations beyond the beginning of the school year for Title I schools needing to inform parents of supplemental services or choice is virtually nonexistent. The Title I schools with choice or supplemental services will remain the same in 2003-2004 as in 2002-2003 with the possible addition of two new Title I schools entering school improvement for the first time, with the potential for choice only. There are no Title I schools at a point where the 2003 AYP determination will add supplemental services to their requirements. Since it takes two years of making AYP before the schools can exit school improvement, even if they make AYP, the currently identified Title I schools will continue to have the supplemental services and choice requirements, as applicable.

Title I schools currently in school improvement will be told they must inform parents of supplemental services and choice, as applicable, before the beginning of the 2003-2004 school year. In the case of the two new Title I schools, there are not schools of comparable grade span within the LEA to which students can transfer. These schools will be required to inform parents about choice before the beginning of the 2003-2004 school year, as outlined in the U.S. DOE choice guidance in anticipation of their possible identification. As soon as we receive the assessment

results from Harcourt, we will validate these two schools to ensure that they have the earliest complete information for parents.

Rule 2550 will need to be changed to reflect the annual AYP determination/report as well as the addition of preliminary determinations and the process and timeframe for making final determinations.

PRINCIPLE 5. All public schools and LEAs are held accountable for the achievement of individual subgroups.

5.1 How does the definition of adequate yearly progress include all the required student subgroups?

5.2 How are public schools and LEAs held accountable for the progress of student subgroups in the determination of adequate yearly progress?

5.3 How are students with disabilities included in the State's definition of adequate yearly progress?

5.4 How are students with limited English proficiency included in the State's definition of adequate yearly progress?

Vermont collects demographic information on all the required subgroups through its annual demographic collection and the state's Child Count for students with special needs. Based on our unique student identifier, we are able to match the Child Count database to the demographic file.

We will modify the demographic collection to enable us to disaggregate graduation rate and attendance. It is this collection that provides the definitions and the data source for the required subgroups for both accountability and reporting. Vermont will include subgroup accountability using the same methodology as for the all student group. **We will add the subgroup accountability requirement to the Rules for the Vermont School Accountability System Based on Student Performance.**

In many cases there are not sufficient numbers of students (less than 80 over two years) in subgroups to make reliable decisions using the AYP methodology outlined in A3. Therefore, by continuing to weight the assignment of points to achievement levels, as described in Table 1, schools will need to move all students, regardless of subgroup, out of the bottom performance levels in order to meet AMOs, Intermediate Goals and the 100% proficient goal in 2013-2014. This will ensure student progress even for those subgroups that will not have sufficient students to be held accountable at the school building level.

In the early years of the system, Vermont will have more schools needing a small school review because they average fewer than 40 students per year in any consecutive two-year span in the all student group. However, beginning in SY 2005-2006, the number of the schools needing a small school review will decrease because

of the addition of assessments at grades 3, 5, 7 and 9. The additional assessments will, of course, also increase the numbers of students in subgroups and increase our ability to make reliable decisions about subgroups in more schools. In addition, the department capacity that was focused on the small schools reviews can shift to a focus on reviews based on small subgroups.

Rule 2530 currently states:

"The State Board shall include the results of alternate assessments in the accountability system for eligible students with Individual Education Plans, 504 Plans, or limited English proficiency, when such assessments are developed and when they meet accepted technical standards. Specific details concerning the inclusion of alternate assessments in the accountability system shall be described in the Accountability Operations Manual."

Students from special populations, including students with disabilities and students with limited English proficiency, are included in accountability in two ways: (1) administration of regular assessments with approved accommodations, and (2) participation in one of three alternate assessment options.

Approved accommodations are those that do not alter the nature or difficulty level of assessment items and tasks. For that reason, not all accommodations apply to every statewide assessment (See Attachment X: Allowable Accommodations Grid). Accommodation decisions are made on a case-by-case and test-by-test basis by school instructional teams. Specific accommodations that are used must be indicated on the cover sheet that accompanies each student's completed assessment. For accountability purposes, results from accommodated assessments are treated as comparable to results from standard administrations. During the 2002 statewide assessments, slightly less than 7 percent of students participated in the state assessments using approved accommodations.

For students who cannot participate in regular assessments even with accommodations, three alternate assessment options are available to meet their specific needs. Alternate assessment options, and the students who would be eligible for each type, are described below.

1. Modified Assessments are provided for students who are working on the same content standards as their grade level classmates, and within the same general range of proficiency, but who cannot participate in regular assessments because the accommodations they would need to participate do not meet criteria for approval (i.e., would change the nature or difficulty level of assessment items or tasks). Students accessing this alternate assessment option are generally those with sensory impairments, or students who would experience extreme emotional or educational harm through participation in general testing. Modified assessments are based on a portfolio of work samples or alternative testing that reflects the student's proficiency levels on the same standards that are measured by the regular assessment. Modified assessment portfolios are evaluated by experts in the area being assessed, resulting in

assignment of a proficiency level for the student that is included in accountability results. For accountability purposes, results from modified assessments are treated as comparable to results from standard or accommodated administrations of the regular statewide assessment (See Attachment W: Alternate Assessment Options and Score Transformation Rules). On the 2002 statewide assessments, approximately .2 percent of students participated in assessments using the modified assessment option.

2. Adapted Assessments are provided for students who are working on the same content standards as their grade level classmates, but who cannot be accurately assessed by regular assessments because their exact proficiency levels are below the levels measured by the regular assessment. Students accessing this option are typically those with learning disabilities or mild to moderate cognitive impairments that have resulted in significant deficits in one or more achievement areas. Use of this alternate assessment option is applied on a test-by-test basis, that is, an eligible student might have an adapted assessment in one achievement area, but take the regular assessment in the other achievement areas that are assessed. Adapted assessments make use of regular statewide assessments from lower grade levels or alternative tests that measure standards and proficiency levels equivalent to the regular statewide assessments. Adapted assessments are scored by trained personnel at Harcourt Measurement, using the same rubrics that apply to regular statewide assessments.

For accountability purposes, results from adapted assessments are not treated as comparable to results from standard or accommodated administrations of regular statewide assessments. Instead, transformation rules are used to convert adapted assessment results into grade level proficiency levels. (See Attachment W: Alternate Assessment Options and Score Transformation Rules). For example, if an eighth grade student scored at the proficient level on the fourth grade statewide test, the score would be entered into accountability results as not proficient. Transformation rules were originally developed through comparisons of the rubrics used to score the statewide assessment. In addition, a validation study of transformation rules will be conducted attendant to the 2003 statewide assessment. This study has been designed to confirm score transformations through double scoring of adapted assessments using both test level and grade level rubrics. The major purpose for this option is to avoid subjecting students to assessments that have few or no questions they can answer. Instead, they participate in assessments that are more appropriate to their academic development, provide a more detailed achievement profile than would be possible on the regular grade level assessment, and through transformation rules, contribute accurate results to accountability. During the 2002 statewide assessments, approximately two percent of students participated in assessments using the adapted assessment option.

3. Lifeskills Portfolios are provided for students who are working on standards that parallel the content standards that apply to their grade level classmates, but that are not measured by the regular statewide assessment (e.g., augmentative communication instead of written communication). Students accessing this option are typically those with significant cognitive deficits or multiple disabilities. Concurrent to regular statewide assessment, lifeskills portfolios are assembled in two of five focus areas:

(1) communication, (2) selected academics, (3) personal development and socialization, (4) home/school/community, and (5) vocational/leisure. Focus areas are selected in order to reflect current priorities in the student's individualized learning plan. Portfolios include documentation of effective program components, and individualized assessment results reflecting progress over one school year on a total of six learning outcomes, three in each focus area. The specific learning outcomes assessed in each student's lifeskills portfolio are selected from a developmental hierarchy of standards-referenced learning outcomes to reflect the efficacy of the student's current instructional program.

Lifeskills Portfolios are evaluated by exemplary educators selected to represent each region of the state, as well as a variety of professional roles and grade level responsibilities. After training and practice, scorers use a set of analytic rubrics and standardized scoring procedures (see attached) in order to determine an overall rating for a student's portfolio. Portfolios are evaluated in three areas: (1) evidence that individualized goals and objectives are referenced to Vermont Standards, (2) evidence that progress toward meeting those standards is assessed using appropriate measurement strategies, (3) evidence that the student's program has resulted in measurable achievement. At least 20 percent of portfolios are double scored to establish reliability. In cases when scorers disagree, a third scoring occurs and the three scorers meet to negotiate a final rating. Prior to each scoring session, scorers complete calibration exercises. Scorers who fail to meet pre-established criteria participate in focused training and must re-calibrate before they can resume official scoring responsibilities.

For accountability purposes, the overall rating for each Lifeskills Portfolio is converted into an accountability index rating using a set of transformation rules (See Attachment W: Alternate Assessment Options and Score Transformation Rules). For example, a lifeskills portfolio that is rated as "Meeting Program Expectations" would produce an accountability rating equivalent to the proficient level on the regular assessment. During the 2002 statewide assessments, approximately .9 percent of students participated in assessments using the lifeskills portfolio option.

In order to ensure that alternate assessment options are being offered to appropriate students, and to prevent potential abuses, schools must provide documentation and obtain prior approval from the Department before a student is considered eligible for an alternate assessment (See Attachment AA: Documentation of Eligibility for Alternate Assessment form). At the time alternate assessments are scored, the Department's eligibility decisions are audited by scorers and disagreements are resolved through requests to the school for additional information. In 2002, the audit confirmed accuracy for 99 percent of eligibility decisions.

Any student who does not participate in assessment, including accommodated administrations of regular assessments and alternate assessments, **without an approved medical or student/family crisis exemption**, is assigned the point value (0) for accountability, indicating the lowest performance level "Little or No Evidence of

Achieving the Standard.” The Department identifies instances of non-participation by crosschecking enrollment data against the list of students producing a valid assessment. This data is then crosschecked against the Department’s database of students approved for alternate assessments to identify any students who should have produced accountability results but did not.

Only those students participating in Lifeskills (.7-.9%) are included in accountability in relation to alternate standards. Those students participating in out-of-level or modified assessments are included in relation to on-level standards.

Vermont’s system of participation options and alternate assessments was developed in response to extensive constituent input and field study (see policy study, attached). The three alternate assessment options were designed specifically to address major obstacles to full participation identified by teachers and administrators. Subsequent field-testing resulted in a high level of confidence and satisfaction with the array of assessments and procedures that comprise the current system. As a final analysis prior to full implementation, the Department has undertaken a two-year external validation study. Year-one results (see Attachment DD: Assessment Participation Pilot Study and Comments) confirmed that: (1) alternate assessment procedures are being implemented with fidelity, (2) the correct students are participating in alternate assessments, with no discernible abuses, (3) the number of students who are not being assessed is negligible, and (4) scoring procedures are reliable and will likely improve with repeated administrations.

Score transformations for modified assessments and adapted assessments are based on grade level standards and proficiency expectations. Score transformations for lifeskills portfolios reflect measurable achievement on individualized goals and standards. As result, all accountability results for students with disabilities have the capacity to represent adequate yearly progress with respect to the specific curriculum, instruction and supports that comprise the student’s regular and special education programs.

NSRE English Language Arts for English Language Learners

English Language Arts (ELA), grades 4, 8 and 10 – English language learners (ELLs) who have attended U.S. schools for **less than three full academic years** can take either the regular New Standards Reference Exam (NSRE) ELA, the regular New Standards Reference Exam (NSRE) ELA with accommodations (e.g., extra time, having it read orally to them), or take the ELA Alternate Assessment. This year, the ELA Alternate Assessment is the Idea Proficiency Test (IPT). Though the IPT was designed to measure an ELL’s English language proficiency (ELP) and not be an ELA Alternate Assessment, it is the best option available to us at this time. IPT scores will be translated into ELA equivalent scores. **These students will not be considered participants in assessment for 2003. Department staff is currently working to identify an appropriate test for the 2004 ELA Alternate Assessment.**

ELLs who have attended U.S. schools **more than three full academic years** may only take the regular New Standards Reference Exam (NSRE) ELA or the regular New

Standards Reference Exam (NSRE) ELA with accommodations (e.g., extra time, having it read orally to them). However, ELLs who have attended U.S. schools for **more than three full academic years, but less than five full academic years** may be allowed to take the ELA Alternate Assessment on a case-by-case basis, utilizing the ELL Documentation of Eligibility for Alternate Assessment procedures.

NSRE Mathematics for English Language Learners

Mathematics, grades 4, 8, and 10 - English language learners (ELLs) who have attended U.S. schools for **less than three full academic years** can take either the regular New Standards Reference Exam (NSRE) Mathematics, the regular New Standards Reference Exam (NSRE) Mathematics with accommodations (e.g., extra time, having it read orally to them), or pilot the NSRE Modified Mathematics exam. Based on scientific research, the NSRE Modified Mathematics exams will assess the exact same mathematics content as their NSRE Mathematics counterparts (in grades 4, 8, and 10), but will comprise items with less non-mathematical language complexity and more familiar problem contexts. Further, it will possess an item-by-item visual dictionary of non-mathematical vocabulary. This dictionary will further reduce the likelihood that non-mathematical language will interfere with assessing mathematics an ELL's skills, content, and problem-solving abilities.

ELLs who have attended U.S. schools for **more than three full academic years** may only take the regular New Standards Reference Exam (NSRE) Mathematics or the regular New Standards Reference Exam (NSRE) Mathematics with accommodations (e.g., extra time, having it read orally to them). However, ELLs who have attended U.S. schools for **more than three full academic years, but less than five full academic years** may be allowed to pilot the NSRE Modified Mathematics exam on a case-by-case basis utilizing the ELL Documentation of Eligibility for Alternate Assessment procedures.

Documentation

Schools are to fill out an *ELL Documentation of Eligibility* form for each ELL who wants to participate in an alternate or modified assessment and send it to the State Department of Education.

Developmental Reading Assessment (DRA)

Developmental Reading Assessment (DRA), grade 2 - English language learners (ELLs) can take either the regular DRA or the DRA with accommodations (e.g., extra time, having it read orally to them). At this time there does not exist a DRA Alternate Assessment.

VT PASS (Science assessment)

VT PASS (Science assessment, grades 5, 9 and 11 - English language learners (ELLs) can take either the regular VT PASS or the VT PASS with accommodations (e.g., extra

time, having it read orally to them). At this time there does not exist a VT PASS Alternate Assessment.

Beyond 2003

The development and piloting of the NSRE Modified Mathematics assessment is the first step toward meeting the NCLBA goal of equitably including all ELLs in statewide mathematics assessments. By 2006 – 2007, there will be an ELL assessment system in place to fully include ELLs in statewide Mathematics and English Language Arts assessments. By 2007 – 2008, that system will include the statewide science assessments as well. This development will take place as a result of long-term, regular collaboration between Titles I and III team members within Vermont.

Evidence:

Attachment B: Rules for Vermont's School Accountability System Based on Student Performance, September 2000

Attachment S: October 1, Student Census and Demographic Update

Attachment W: Alternate Assessment Options and Score Transformation Rules

Attachment X: Allowable Accommodations Grid

Attachment Y: Step-by-Step Procedures for Scoring Lifeskills Portfolios

Attachment Z: Lifeskills Rubrics

Attachment AA: Documentation of Eligibility for Alternate Assessment

Attachment BB: Policy Analysis: Full Participation for All Students in State and Districtwide Accountability Assessments, January 1999, Michael Hock

Attachment CC: Cost and Benefit Analysis of Six Lifeskills Portfolio Implementation Models, Spring 1999, Michael Hock and Susan Cano

Attachment DD: Assessment Participation Pilot Study Results and Comments

Attachment EE: Proposed Assessment Participation procedures and Options: Spring 1999 Pilot Study

Attachment FF: English Language Learner (ELL) Documentation of Eligibility (School Year 2002-2003)

Attachment GG: 2002-2003 NCLBA English Language Learner (ELL) Assessment Requirements

5.5 What is the State's definition of the minimum number of students in a subgroup required for reporting purposes? For accountability purposes?

5.6 How does the State Accountability System protect the privacy of students when reporting results and when determining AYP?

Vermont will add a rule to address minimum number of students for reporting. We will set more than 10 as the threshold for public reporting purposes and will apply this consistently across all of our reporting.

For accountability, our “n” is an average of 40 per year for any consecutive 2 year span and the "confidence interval" approach for determining AYP, as described in Section A3, however, as discussed above, we will use Small School Review A for schools whose total assessed population is below 30 in two years of student achievement results regardless of whether their state results indicate that they have met AYP. Small School Review B will evaluate schools between 30 and 79 whose state results indicate that they have not made AYP.

The minimum number of students required for reporting student results in a group to protect the confidentiality of students is set by the state at more than 10, unless all students have the identical classification in which case results will be reported in a manner that protects the confidentiality of the group. For example, for purposes of public reporting, one student can be assigned to another achievement level so that it would any individual student’s performance would not be definitively known but that the results would still indicate close to 100% of the students in the achievement performance level.

The use of confidence intervals to ensure the reliability of the identification system is particularly appropriate for Vermont because the state has a large number of small schools. Small schools are at greater risk for misidentification than large schools. Secondly, as the data are accumulated over a period of years with the addition of the required grade levels in 2005, the confidence intervals will be reduced. Schools that are determined to make AYP because of the small number of students in 2003-2005 will have an increasingly likelihood for a determination of not making AYP when more students are assessed and confidence intervals shrink, if they do not meet the annual measurable objectives. For example, in 2003 27 percent of the state’s schools will present test data for fewer than 50 students. This proportion declines by about 20 percent per year beginning in 2005.

Thirdly, Vermonters are used to viewing school performance with respect to confidence intervals. The Department Graphing Web Site presents school totals of percentage

proficient for each school and the state with contrasting confidence intervals. (see <http://data.ed.state.vt.us/apg/index.html>) (see also: *Making Valid and Reliable Decisions in Determining Adequate Yearly Progress*, CCSSO, December, 2002)

PRINCIPLE 6. State definition of AYP is based primarily on the State's academic assessments.

6.1 How is the State's definition of adequate yearly progress based primarily on academic assessments?

The School Accountability System Based on Student Performance is currently based on the New Standards Reference Examination in mathematics and English Language Arts and the Vermont Developmental Reading Assessment. The other indicators included in our plan for AYP are those required by NCLBA: graduation rate and one indicator each for elementary and middle schools.

The protocol for the Small School Reviews, which will be used only when we cannot make a reliable decision solely on the available results from the state assessments and indicators, will focus on other available school and classroom assessments that are valid and reliable to ensure that decisions are still made on student performance for these very small schools.

Schools reviewed by the Small School Review are those whose cell sizes are so small (even with the aggregation of multiple years of data) that absent the Small Schools Review, no determination of AYP could be validly and reliably made solely on the state student assessment results.

Evidence:

Attachment A: V.S.A. 16 §165 (b) and (c)

Attachment B: Rules for Vermont's School Accountability System Based on Student Performance, September 2000

Attachment II: Vermont Comprehensive Assessment System, November 1996

Attachment PP: Vermont Comprehensive Assessment System, Draft Revisions

PRINCIPLE 7. State definition of AYP includes graduation rates for public High schools and an additional indicator selected by the State for public Middle and public Elementary schools (such as attendance rates).

7.1 What is the State definition for the public high school graduation rate?

7.2 What is the State's additional academic indicator for public elementary schools for the definition of AYP? For public middle schools for the definition of AYP?

7.3 Are the State's academic indicators valid and reliable?

Rule 2518 provides for the addition of academic indicators to Vermont's Accountability System when they are ready. For all schools with Grades 9-12, Vermont will use the percentage of students who receive a diploma within five years of enrollment in Grade 9.

Five-Year Graduation Rate

In April 1999, the Vermont State Board of Education charged the Commissioner with establishing a high school task force to examine the current state of Vermont's high schools and make recommendations for improvement with vigor, professionalism and forward thinking.

In August 2002, the State Board accepted the report of the task force, "High Schools on the Move: Renewing Vermont's Commitment to Quality Secondary Education." This report presents and explains 12 key principles for high school renewal. Several of these, multiple pathways, flexible structures and real-life experiences, for example, acknowledge that individual students need opportunities to pursue individualized learning beyond the walls and the typical timetable of a traditional high school.

For some students, the learning they pursue may take them on a "sabbatical," a period of time away from even the more individually-tailored learning that can be created within our schools. And other students may need to focus on core issues not directly related to academic learning, such as independent living or physical or emotional health. These are students who return to school and graduate, but may need an additional semester or year and should not be labeled prematurely as "dropouts."

A definition of graduation rate which allows these students to make necessary and appropriate choices and their schools to support those choices, knowing that there is the extra time for them to graduate, is an important tool necessary to ensure that Vermont's high school renewal effort is, indeed, forward thinking.

The Vermont Department of Education supports the task force's view that we cannot make substantive changes in the improvement of high school learning if we hold sacrosanct any of the structures and practices that currently define the high school experience. If current practices don't reflect the practical vision of "High Schools on the Move," the State Board and Department support advocacy for change.

In that spirit, the members of the State Board of Education believe that a four-year graduation rate no longer meets our needs. A five-year definition of graduation rate is aligned with the principles of high school renewal and should be used for reporting and accountability.

On April 15, 2003, the Vermont State Board of Education formally approved a five-year definition of graduation for the purposes of school accountability. However, this cannot be calculated and reported accurately until 2005. In the meantime, we will use the four-year calculation for the all student AYP group. We will use the 10th grade New Standards Reference Exam: Basic Reading indicator for subgroup disaggregation until 2005 when we can disaggregate the graduation rate. We will defer our request for a five-year rate until 2005 when we will have the impact data to submit with the request to move to that rate.

Modification of Data Collection Necessary for Graduation Rate Indicator

For 2003, the graduation rate will be estimated with no disaggregation for the required subgroups (low SES, disabilities, LEP, and major racial/ethnic). However, if a school wishes to use safe harbor for a subgroup, the school will need to provide subgroup graduation rates.

Beginning with a modification to our Annual Student Data Collection in Fall 2003, our plan would result in a valid and reliable indicator for a five-year graduation rate with required disaggregations in 2005.

The steps we must take in order to meet this goal include:

Fall 2003: Begin collection of additional data elements that will transform the October 1 Annual Student Census Collection to an "operational" collection that will provide the capacity to calculate the Graduation Rate and Retention Rate as well as serve as the basis for "snapshots" of other specific data sets. We will collect for all students in all Vermont public schools:

- ◆ October collection of beginning and ending dates for each student's most recent period of continuous enrollment in the school
- ◆ October collection of beginning and ending grade enrollment dates
- ◆ June 30 update of October 1 submission collection and addition of any students who have entered or left the school since October 1
- ◆ All graduates would have an end enrollment date and reason of "Graduated"
- ◆ October 2004 collection would update these data after October 1
- ◆ The update burden is transferred from fall to spring as the June update will account for grade promotion and graduation changes (the bulk of the effort)
- ◆ 2004 would be a pilot year for running the data. We would only be able to get a four-year graduation rate, but for 2005, we would be able to determine the five-year graduation rate and use for an accountability determination.

Criteria and Decisions Based on Graduation Rate

Graduation rate will be the academic indicator for all schools that include grades 9-12 and will be based on the aggregation of two years of data. **No confidence interval will be used with graduation rate.** For 2003, the criterion for a school meeting the graduation rate indicator is a rate of 75 percent. The decisions will be as follows:

Determinations of Graduation rate will be made for all those AYP Groups that meet the achievement index n size of an average of 40 students per year for any consecutive two-year span.

Graduation rate will be reviewed, however, as part of either Small School Review.

Evidence:

Attachment B: Rules for Vermont's School Accountability System Based on Student Performance, September 2000

Attachment S: October 1, Student Census and Demographic Update, September 2002

Attachment JJ: Press Release for 2002 Assessment Results

To meet the need for an indicator that can be disaggregated, we propose to use the VT-Developmental Reading Assessment for all students with Grade 2 but not Grades 9-12 and the Reading: Basic Understanding reporting area of the New Standards Reference Exam (Grade 8) for all schools without Grades 9-12 or Grade 2.

Both indicators will aggregate two years of student results and will be able to be disaggregated by all subgroups, as necessary. Criteria for not making AYP would be having 15 percent or more of students in Below the Standard and Little or No Evidence. Two years of results will be combined and a confidence interval of .01 will be used.

Because we can't disaggregate the Graduation Rate until 2005, we will use the Grade 10 NSRE: Reading: Basic Understanding for all subgroups at high school. Criteria for not making AYP would be having 15 percent or more of students in Below the Standard and Little or No Evidence. Two years of results will be combined and a confidence interval of .01 will be used.

PRINCIPLE 8. AYP is based on reading/language arts and mathematics achievement objectives.

8.1 Does the state measure achievement in reading/language arts and mathematics separately for determining AYP?

We have separated the combined index into two content specific indexes (mathematics and reading/language arts), as required in Principle 8.1 to ensure that we are making separate determinations of AYP for each content area. Content specific indexes will maintain equal weighting of basic and analytical reporting areas (for example, in mathematics NSRE Skills is 50 percent of the index and Concepts and Problem Solving are 50 percent

PRINCIPLE 9. State Accountability System is statistically valid and reliable.

9.1 How do AYP determinations meet the State's standard for acceptable reliability?

To ensure that our Accountability System was as reliable as possible, Vermont made the following choices when developing the system:

- Use of Indexes, since school averages based on an index are more reliable than those based on pass/fail judgments
- Require schools to meet one goal combined over all tests rather than requiring them to meet a goal for each of the tests (or reporting areas). The fewer the decisions made, the greater the consistency of the decisions
- Require schools to meet one goal for all students in the school rather than requiring them to meet goals for several subgroups. One decision made on a large group of students is more reliable than several decisions made on smaller groups. The weighting of points was to ensure that schools could not meet goal without moving virtually all students out of performance levels below the standard.
- Average data over two years, since results aggregated over twice as many students are more reliable than those of just one year

Proposed Modifications include Confidence Intervals:

- Will be calculated (plus and minus) around the Annual Measurable Objective (AMO) according to a table that takes into account the AMO and the number of students
- Will be initially set at .01 to ensure a low initial risk for misidentification
- Will be reviewed annually and can be narrowed in later years, as appropriate. As we gain more experience with the system, we might accept a "narrower" or smaller confidence interval and be certain of our determination

The minimum number of students required for reporting student results in a group to protect the confidentiality of students is set by the state at more than 10, unless all students have the identical classification in which case no results will be reported for the group that would identify all students.

In making determinations of AYP although we are using a confidence interval approach for reliability, we are combining this with a minimum "n" of an average

of 40 students per year in any consecutive two-year span in the all student group. At the all school level, any school with fewer than 30 students in two-year rolling average undergoes a small school review, regardless of the decision based on the state assessment data. Any school between 31 and 79 that does not make AYP according to the decision rules in 3.2 will also undergo a Small School Review. At this time, we do not have the capacity to have small subgroup reviews but do intend to add that feature to our system when we have added more students to the accountability system in 2005-2006 and will not need to do as many small school reviews.

Evidence:

Attachment B: Rules for Vermont's School Accountability System Based on Student Performance, September 2000

9.2 What is the State's process for making valid AYP determinations?

Vermont's methodology for making decisions about very small schools supports valid decisions and avoids unnecessary and time-consuming appeals. See Principle 3.2. Rules 2526 and 2545 address appeals processes and will be amended to reflect changes to the system, including the requirement for LEA accountability.

Evidence:

Attachment B: Rules for Vermont's School Accountability System Based on Student Performance September 2000

Attachment NN: Review of Rules aligned to NCLBA Principles

Attachment OO: Initial Revision of Vermont's Rules for School Accountability System Based on Student Performance

9.3 How has the State planned for incorporating into its definition of AYP anticipated changes in assessments?

Vermont Rule 2580 requires an independent external audit of the Accountability System. This will be modified to reflect new timelines for audit because of the revision of the system required by NCLBA.

Rule 2514.2 addresses changes to the state assessments. Vermont has dealt with new school configurations, etc. and will include guidance in the Operations Manual.

Evidence:

Attachment B: Rules for Vermont's School Accountability System Based on Student Performance, September 2000

***Attachment D: Operations Manual for the Vermont School Accountability System
Based on Student Performance, July 2000***

PRINCIPLE 10. In order for a public school or LEA to make AYP, the State ensures that it assessed at least 95% of the students enrolled in each subgroup.

10.1 What is the State's method for calculating participation rates in the State assessments for use in AYP determinations?

10.2 What is the State's policy for determining when the 95% assessed requirement should be applied?

Vermont has policies and procedures to ensure that all students are accounted for in state assessments. These policies and procedures will support the determination of participation rates in assessment for accountability determinations. These include the collection of participation information on test booklets, validation of this information through the participation validation process, and the demographic collection process combined with the child count process for determining student classification in subgroups.

Vermont will establish by rule a policy that sets the "n" for reporting at more than 10 students.

Students without a medical or family/student crisis exemption who don't take the assessment and are in the school on October 1 get both a zero in the accountability index for not participating in assessment and are considered non-participants for calculating participation in groups of sufficient "n" size to be included in AYP.

Students who don't take the test because of medical or crisis exemptions will be considered non-participants for calculating the 95% assessed.

Evidence:

Attachment B: Rules for Vermont's School Accountability System Based on Student Performance, September 2000

Attachment D: Operations Manual for the Vermont School Accountability System Based on Student Performance, July 2000

Attachment S: October 1, Student Census and Demographic Update

Attachment M: Assessment Participation Verification Report (Sample)

Special Attachment ZZ1: Simulation (see attached file for complete set of graphs):

	Grade Span	Percent ProfS	Start Pt.	03 AMO	04 AMO	05 AMO	06 AMO	07 AMO	08 AMO	09 AMO	10 AMO	11 AMO	12 AMO	13 AMO	14 AMO
Math	2-4	0.628	314	314	351	351	351	388	388	388	425	425	425	462	500
ELA	2-4	0.728	364	364	391	391	391	418	418	418	445	445	445	472	500
Math	8	0.592	296	296	337	337	337	378	378	378	419	419	419	460	500
ELA	8	0.684	342	342	374	374	374	406	406	406	438	438	438	470	500
Math	2-4, 8, 10	0.59	295	295	336	336	336	377	377	377	418	418	418	459	500
ELA	2-4, 8, 10	0.734	367	367	394	394	394	421	421	421	448	448	448	475	500
Math	8, 10	0.54	270	270	316	316	316	362	362	362	408	408	408	454	500
ELA	8, 10	0.662	331	331	365	365	365	399	399	399	433	433	433	467	500
Math	10	0.556	278	278	323	323	323	368	368	368	413	413	413	458	500
ELA	10	0.69	345	345	376	376	376	407	407	407	438	438	438	469	500
Math	2-4, 8	0.622	311	311	349	349	349	387	387	387	425	425	425	463	500
ELA	2-4, 8	0.728	364	364	391	391	391	418	418	418	445	445	445	472	500
Math All	4, 8, 10	0.35	175	175	240	240	240	305	305	305	370	370	370	435	500
ELA All	4, 8, 10	0.6	300	300	340	340	340	380	380	380	420	420	420	460	500
	Grade Span	Percent ProfS	Start Pt.	03 AMO	04 AMO	05 AMO	06 AMO	07 AMO	08 AMO	09 AMO	10 AMO	11 AMO	12 AMO	13 AMO	14 AMO
Math	2-4	0.628	0.628	0.628	0.702	0.702	0.702	0.776	0.776	0.776	0.85	0.85	0.85	0.924	1
ELA	2-4	0.728	0.728	0.728	0.782	0.782	0.782	0.836	0.836	0.836	0.89	0.89	0.89	0.944	1
Math	8	0.592	0.592	0.592	0.674	0.674	0.674	0.756	0.756	0.756	0.838	0.838	0.838	0.92	1
ELA	8	0.684	0.684	0.684	0.748	0.748	0.748	0.812	0.812	0.812	0.876	0.876	0.876	0.94	1
Math	2-4, 8, 10	0.59	0.59	0.59	0.672	0.672	0.672	0.754	0.754	0.754	0.836	0.836	0.836	0.918	1
ELA	2-4, 8, 10	0.734	0.734	0.734	0.788	0.788	0.788	0.842	0.842	0.842	0.896	0.896	0.896	0.95	1
Math	8, 10	0.54	0.54	0.54	0.632	0.632	0.632	0.724	0.724	0.724	0.816	0.816	0.816	0.908	1
ELA	8, 10	0.662	0.662	0.662	0.73	0.73	0.73	0.798	0.798	0.798	0.866	0.866	0.866	0.934	1
Math	10	0.556	0.556	0.556	0.646	0.646	0.646	0.736	0.736	0.736	0.826	0.826	0.826	0.916	1
ELA	10	0.69	0.69	0.69	0.752	0.752	0.752	0.814	0.814	0.814	0.876	0.876	0.876	0.938	1
Math	2-4, 8	0.622	0.622	0.622	0.698	0.698	0.698	0.774	0.774	0.774	0.85	0.85	0.85	0.926	1
ELA	2-4, 8	0.728	0.728	0.728	0.782	0.782	0.782	0.836	0.836	0.836	0.89	0.89	0.89	0.944	1
Math All	4, 8, 10	0.35	0.35	0.35	0.48	0.48	0.48	0.61	0.61	0.61	0.74	0.74	0.74	0.87	1
ELA All	4, 8, 10	0.6	0.6	0.6	0.68	0.68	0.68	0.76	0.76	0.76	0.84	0.84	0.84	0.92	1

Math, 2-4 Grade Span Index

Year	Index
1	314
2	314
3	351
4	351
5	351
6	388
7	388
8	388
9	425
10	425
11	425
12	462
13	500

ELA 2-4 Grade Span Index

Year	Index
1	364
2	364
3	391
4	391
5	391
6	418
7	418
8	418
9	445
10	445
11	445
12	472
13	500

Special Attachment ZZ.2: Relationship of Vermont Accountability Index to Percent Proficient.

Relationship of Vermont Accountability Index to Percent Proficient

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Draft revised: May 5, 2003

Background

Vermont has implemented a school accountability system since 2000. It is based upon an index, where schools receive credit for increasing proportions of students at higher performance levels. There are several advantages to index systems, including being more reliable than pass/fail systems, more sensitive to movement between lower achievement levels, and related to the familiar performance standard labels.

In proposing a modified system that will be compliant with the requirements of the federal *No Child Left Behind Act* (NCBLA), the question was raised about the relationship between performance on the Vermont index system and the NCBLA “percent proficient” metric. In particular, the question was whether a school that made the proposed 10% increase in index score could be viewed as making significant and substantial progress, especially in terms of percent proficient.

Relationship of Vermont Accountability Index to Percent Proficient

Using a combination of simulations (Table 2) and analyses of actual Vermont assessment data (Table 1), the following conclusions were made:

1. It is not possible for a low-scoring school to make the 10% increase in index scores over a sustained period of time without increasing the percentage of students at the proficient level (Achieved the Standard).
2. It is conceptually possible for a school to make the 10% increase in index scores by moving all students from the lowest categories into the category just below proficient for five or six years. This would show no increase in the percent proficient, but would represent substantial increases in student performance. For example, in the low-scoring school with 220 students, all 66 students in the bottom two categories would need to be moved up within one year, and the category just below proficient would need to increase by about 30 students per year. If one posited that this school had about 50% Title I and special education students, then all 100 of them would need to move at least one achievement level in the first two years—even though no would become proficient (in the worst case scenario).
3. Empirically fewer than 3% of Vermont schools increased 10% of their index and did not increase the percentage of students scoring proficient on the Vermont assessment. This indicates that while it is possible, it occurred rarely in the 2001-02 data examined.

4. Note that because Vermont does not provide compensatory index points for student scoring above proficient, once a school has all students in the category below proficient, any increase in the index must be coupled with an increase in percent proficient. The simulations illustrate this point.

Table 1: Schools that would meet “safe harbor” but not increase percentage of students scoring proficient on some aspect of ELA or math assessments.

School Size (Number of students assessed)	Number of Schools that met Safe Harbor but did not increase % Proficient	Total Number of Schools	Percent of Total
1-9	1	31	3%
10-29	3	77	4%
30-49	0	63	0%
50-99	1	58	2%
100+	0	77	0%
Total	5	306	2%
Note: % Proficient calculated by NSRE reporting area. Results for schools with data for both 2001 and 2002.			

Notes

Table 1 reflects actual results for Vermont schools, using assessment data from 2001 and 2002, and the index as proposed for NCBLA.

Table 2 reflects simulation results in a “worst case scenario.” It was assumed that all increases in student performance happen at the lowest levels. (This was *not* true for 98% of the schools, as shown by Table 1; only 2% of the schools had an increase of 10% in the index without some increase in percent proficient.) Table 2 shows that for a range of school sizes and starting distributions, the index changes associated with meeting a “safe harbor” increase of 10% in the index is always associated with an increase in percent proficient over time, usually beginning in Year 5 or 6 in these “worst case scenarios.” Because Vermont’s index system has a relatively lower weight on its bottom two levels, it requires a relatively faster movement of students into the categories approaching proficient.

The four cases in Table 2 represent: a) an actual school, a moderate distance below the AMO; b) actual school, far from the AMO; c) composite school similar to school A, but with fewer students (like many VT schools); and d) composite school close to the AMO.

Legend for Table 2:

N – total number of students assessed in the school

Zero, Little, Below, Nearly, Achieved, Honors – Names of VT’s achievement levels

0, 50, 100, 300, 500, 500 – Index points associated with each achievement level

Index – Index score generated from the numbers of students shown at each achievement level

SH Goal – Required index score to meet “safe harbor,” calculated as 10% increase from previous year’s index

% Prof. – Percent proficient and above (Achieved plus Honors) in that year

%Prof-SH – Percent proficient that would have been required under NCLBA safe harbor
Goal – Long-term goal of system in accountability index points (all students proficient or above)
Diff. – Difference between long-term goal and current index score
10% - 10% of difference, equal to “safe harbor” for index system

Table 2: Simulations of “Worst Case” Scenarios for Increasing Percent Proficient.

	N	Zero	Little	Below	Nearly	Achieved	Honors								
MATH		0	50	100	300	500	500	Index	SH Goal	% Prof.	%Prof-SH	Goal	Diff	10%	
Base	88	3	9	19	25	31	1	293.8		36%	36	500	206.3	20.6	
Yr1	88	0	0	25	31	31	1	315.9	314.4	36%	42	500	184.1	18.4	
Yr2	88	0	0	16	40	31	1	336.4	334.3	36%	48	500	163.6	16.4	
Yr3	88	0	0	8	48	31	1	354.5	352.7	36%	53	500	145.5	14.5	
Yr4	88	0	0	1	55	31	1	370.5	369.1	36%	58	500	129.5	13.0	
Yr5	88	0	0	0	50	37	1	386.4	383.4	43%	62	500	113.6	11.4	
Yr6	88	0	0	0	45	42	1	397.7	397.7	49%	66	500	102.3	10.2	
Yr7	88	0	0	0	40	47	1	409.1	408.0	55%	69	500	90.9	9.1	
Yr8	88	0	0	0	36	51	1	418.2	418.2	59%	72	500	81.8	8.2	
Yr9	88	0	0	0	32	55	1	427.3	426.4	64%	75	500	72.7	7.3	
Yr10	88	0	0	0	28	59	1	436.4	434.5	68%	78	500	63.6	6.4	
Yr11	88	0	0	0	25	62	1	443.2	442.7	72%	80	500	56.8	5.7	
Yr12	88	0	0	0	22	65	1	450.0	448.9	75%	82	500	50.0	5.0	

MATH		0	50	100	300	500	500	Index	SH Goal	% Prof.	%Prof-SH	Goal	Diff	10%	
Base	220	5	61	68	45	35	6	199.3		19%	19	500	300.7	30.1	
Yr1	220	0	0	118	61	35	6	230.0	229.4	19%	27	500	270.0	27.0	
Yr2	220	0	0	88	91	35	6	257.3	257.0	19%	34	500	242.7	24.3	
Yr3	220	0	0	61	118	35	6	281.8	281.5	19%	41	500	218.2	21.8	
Yr4	220	0	0	40	139	35	6	300.9	303.6	19%	47	500	199.1	19.9	
Yr5	220	0	0	18	161	35	6	320.9	320.8	19%	52	500	179.1	17.9	
Yr6	220	0	0	0	177	37	6	339.1	338.8	20%	57	500	160.9	16.1	
Yr7	220	0	0	0	158	56	6	356.4	355.2	28%	61	500	143.6	14.4	
Yr8	220	0	0	0	142	72	6	370.9	370.7	35%	65	500	129.1	12.9	
Yr9	220	0	0	0	127	87	6	384.5	383.8	42%	69	500	115.5	11.5	
Yr10	220	0	0	0	113	101	6	397.3	396.1	49%	72	500	102.7	10.3	
Yr11	220	0	0	0	101	113	6	408.2	407.5	54%	75	500	91.8	9.2	
Yr12	220	0	0	0	90	124	6	418.2	417.4	59%	77	500	81.8	8.2	

MATH		0	50	100	300	500	500	Index	SH Goal	% Prof.	%Prof-SH	Goal	Diff	10%
Base	22	1	2	6	6	6	1	272.7		32%	36	500	227.3	22.7
Yr1	22	0	0	7	8	6	1	300.0	295.5	32%	42	500	200.0	20.0
Yr2	20	0	0	4	9	6	1	330.0	320.0	35%	48	500	170.0	17.0
Yr3	21	0	0	2	12	6	1	347.6	347.0	33%	53	500	152.4	15.2
Yr4	21	0	0	0	14	6	1	366.7	362.9	33%	58	500	133.3	13.3
Yr5	22	0	0	0	12	9	1	390.9	380.0	45%	62	500	109.1	10.9
Yr6	22	0	0	0	10	11	1	409.1	401.8	55%	66	500	90.9	9.1
Yr7	22	0	0	0	9	12	1	418.2	418.2	59%	69	500	81.8	8.2
Yr8	22	0	0	0	8	13	1	427.3	426.4	64%	72	500	72.7	7.3
Yr9	22	0	0	0	7	14	1	436.4	434.5	68%	75	500	63.6	6.4
Yr10	22	0	0	0	6	15	1	445.5	442.7	73%	78	500	54.5	5.5
Yr11	22	0	0	0	5	16	1	454.5	450.9	77%	80	500	45.5	4.5
Yr12	22	0	0	0	4	17	1	463.6	459.1	82%	82	500	36.4	3.6

MATH		0	50	100	300	500	500	Index	SH Goal	% Prof.	%Prof-SH	Goal	Diff	10%
Base	88	4	8	9	13	47	7	365.9		61%	61	500	134.1	13.4
Yr1	88	0	0	19	15	47	7	379.5	379.3	61%	65	500	120.5	12.0
Yr2	88	0	0	13	21	47	7	393.2	391.6	61%	69	500	106.8	10.7
Yr3	88	0	0	8	26	47	7	404.5	403.9	61%	72	500	95.5	9.5
Yr4	88	0	0	3	31	47	7	415.9	414.1	61%	75	500	84.1	8.4
Yr5	88	0	0	0	33	48	7	425.0	424.3	63%	77	500	75.0	7.5
Yr6	88	0	0	0	29	52	7	434.1	432.5	67%	79	500	65.9	6.6
Yr7	88	0	0	0	26	55	7	440.9	440.7	70%	82	500	59.1	5.9
Yr8	88	0	0	0	23	58	7	447.7	446.8	74%	83	500	52.3	5.2
Yr9	88	0	0	0	20	61	7	454.5	453.0	77%	85	500	45.5	4.5
Yr10	88	0	0	0	18	63	7	459.1	459.1	80%	87	500	40.9	4.1
Yr11	88	0	0	0	16	65	7	463.6	463.2	82%	88	500	36.4	3.6
Yr12	88	0	0	0	14	67	7	468.2	467.3	84%	89	500	31.8	3.2

Consolidated State Application Accountability Workbook State of Vermont

**for State Grants under Title IX, Part C, Section 9302 of the Elementary and
Secondary Education Act (Public Law 107-110)**

**DUE: JANUARY 31, 2003
Revised: July 24, 2006**



**U. S. Department of Education
Office of Elementary and Secondary Education
Washington, D.C. 20202**

Summary of Implementation Status for Required Elements of State Accountability Systems

Status	State Accountability System Element
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Principle 1: All Schools

F	1.1	Accountability system includes <i>all schools and districts in the state</i> .
F	1.2	Accountability system holds <i>all schools to the same criteria</i> .
F	1.3	Accountability system incorporates the <i>academic achievement standards</i> .
F	1.4	Accountability system provides <i>information in a timely manner</i> .
F	1.5	Accountability system includes <i>report cards</i> .
P	1.6	Accountability system includes <i>rewards and sanctions</i> .

Principle 2: All Students

	2.1	The accountability system includes <i>all students</i>
F	2.2	The accountability system has a consistent definition of <i>full academic year</i> .
F	2.3	The accountability system properly includes <i>mobile students</i> .

Principle 3: Method of AYP Determinations

F	3.1	Accountability system expects <i>all student subgroups, public schools, and LEAs to reach proficiency by 2013-14</i> .
F	3.2	Accountability system has a method for determining whether <i>student subgroups, public schools, and LEAs made adequate yearly progress</i> .
F	3.2a	Accountability system establishes a <i>starting point</i> .
F	3.2b	Accountability system establishes <i>statewide annual measurable objectives</i> .
F	3.2c	Accountability system establishes <i>intermediate goals</i> .

Principle 4: Annual Decisions

P	4.1	The accountability system <i>determines annually the progress</i> of schools and districts.
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STATUS Legend:

F – Final state policy
P – Proposed policy, awaiting State approval
W – Working to formulate policy

Principle 5: Subgroup Accountability

F	5.1	The accountability system <i>includes all the required student subgroups</i> .
F	5.2	The accountability system holds <i>schools and LEAs accountable for the progress of student subgroups</i> .
F	5.3	The accountability system includes <i>students with disabilities</i> .
F	5.4	The accountability system includes <i>limited English proficient students</i> .
F	5.5	The State has determined the minimum number of students sufficient to yield statistically reliable information for each purpose for which disaggregated data are used.
F	5.6	The State has strategies to protect the privacy of individual students in reporting achievement results and in determining whether schools and LEAs are making adequate yearly progress on the basis of disaggregated subgroups.

Principle 6: Based on Academic Assessments

F	6.1	Accountability system is based <i>primarily on academic assessments</i> .
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Principle 7: Additional Indicators

P	7.1	Accountability system includes <i>graduation rate for high schools</i> .
F	7.2	Accountability system includes an <i>additional academic indicator for elementary and middle schools</i> .
F	7.3	Additional indicators are valid and reliable.

Principle 8: Separate Decisions for Reading/Language Arts and Mathematics

P	8.1	Accountability system holds students, schools and districts separately accountable for <i>reading/language arts and mathematics</i> .
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Principle 9: System Validity and Reliability

F	9.1	Accountability system produces <i>reliable decisions</i> .
F	9.2	Accountability system produces <i>valid decisions</i> .
F	9.3	State has a plan for addressing <i>changes in assessment and student population</i> .

Principle 10: Participation Rate

F	10.1	Accountability system has a means for calculating the <i>rate of participation</i> in the statewide assessment.
F	10.2	Accountability system has a means for <i>applying the 95% assessment criteria to student subgroups and small schools</i> .

Principle 1: All Schools

1.1 Accountability system includes all schools and districts in the state.

1.2 Accountability system holds all schools to the same criteria.

Comments below relate to 1.1 and 1.2.

In September 2004, revised Rules for Vermont's School Accountability System Based on Student Achievement took effect, replacing the rules adopted in July 2000. A copy of the rules is attached.

In 2004, through Act 114, Sec. 3 (adding section 26 to 16 V.S.A. 563), the legislature made local school districts LEAs for purposes of meeting NCLBA accountability requirements. Under the Workbook of June 2003, Vermont's supervisory unions were LEAs.

With the New England Common Assessment Program (NECAP, with New Hampshire and Rhode Island) reading and mathematics examinations in grades 3-8, and NECAP writing in grades 5 and 8, first implemented in Fall 2005, and with the administration of the New Standards Reference Exam in grade 10 in March 2006, all Vermont schools have testing required by NCLBA. There will be new NECAP reading, mathematics, and writing in high schools beginning in Fall 2007.

With the implementation of NECAP testing, Vermont no longer uses the Small Schools Review described in the 2003 Workbook. Instead, the State will make AYP decisions for all schools for the All Student Group, regardless of the "n" size, using the indexes. Vermont will apply a minimum 'n' of 40 or more students for subgroup decisions for one year of results (no longer combining two years of results into a rolling average) and continue to use a confidence interval of .01.

1.3 Accountability system incorporates the academic achievement standards.

For the new NECAP tests, Vermont has adopted four performance levels (with corresponding index values) - proficient with distinction (500 points), proficient (500 points), partially proficient (375 points), and substantially below proficient (250 and 125 points based on scale scores within that achievement level). Vermont will report percent proficient regardless of whether the index scores are reported.

With four achievement levels for NECAP instead of five for NSRE, the substantially below proficient band is larger. We have split it into two segments by using scale scores and will assign 250 points to those students in the upper segment (closer to the cut point for partially proficient) and 125 to those in the lower segment. Students who participate in NECAP but do not have a scale score receive 0 points.

1.4 Accountability system provides information in a timely manner.

As indicated above, the new NECAP assessments in grades 3-8 are given in the fall, with results available in late winter/early spring. This will become the case for high schools with the Fall 2007 tests.

The following table illustrates how Vermont will provide accountability information in a timely manner

When Learning/Teaching Occurs	When Assessment Occurs& When AYP Determinations are Made	When AYP Consequences Apply
SY 2004-2005	Assessment, Fall 2005 AYP Determination, Winter/Spring 2006	SY 2006-2007
SY 2005-2006	Assessment, Fall 2006 AYP Determination, Winter/Spring 2007	SY 2007-2008

As indicated above, the new NECAP assessments in grades 3-8 are given in the fall, with results available in late winter/early spring. This will become the case for high schools with the Fall 2007 tests.

AYP decisions for 9-12 high schools will be made as soon after receiving and verifying Spring 2006 NSRE results as possible – most likely October 2006. These decisions will apply to SY06-07. In Spring 2007, when we make AYP decisions to apply to SY07-08, decisions for 9-12 high schools will be based only on the academic indicator (graduation rate) for this one-time transitional decision. In Spring 2008, results from NECAP 2007 fall testing at grades 3-8 and grade 11 will determine school status for SY08-09.

1.5 Accountability system includes report cards

1.6 Accountability system includes rewards and sanctions

The issue of rewards was discussed during the recent Title I monitoring visit. We met with the Committee of Practitioners on June 22, 2006 and they recommended that:

Since the criteria for Academic Achievement Recognition (AAR) must be based on AYP results, schools that meet the criteria for receiving AAR will have that status published on their AYP report and information about these schools will be released as part of the AYP press release.

Criteria:

- A school may achieve AAR in either reading and/or mathematics but must meet the criteria for the student groups described in NCLBA 1111 (b) (2) and must also meet the Academic Indicator for the school.
- A school can achieve AAR if those student groups in NCLBA 1111 (b) (2):
- Have an index score at least one point above the required AMO for two consecutive years, or,
- Increase their index by a specific point value from one year to the next

Principle 2: All Students

2.1 Accountability system includes all students

2.2 Accountability system has a consistent definition of full academic year

2.3 Accountability system properly includes mobile students

Comments below apply to 2.1, 2.2, and 2.3 above.

Vermont has adopted a new definition for “full academic year” because the State is tracking students through its fall and spring data collections. The new definition holds schools accountable for those students who have been continuously enrolled from the first day of school to the last.

For AYP, because the NECAP is administered in the fall but assesses the learning that students did during the prior school year, we count student results at the school in which they did the learning. If students attended the school where they did the learning for the full academic year, their results are included for that school in its AYP index. We hold schools accountable for participation based on where students take the test.

Principle 3: Method of AYP Determinations

3.1 Accountability system expects all student subgroups, public schools, and LEAs to reach proficiency by 2013-2014.

With the adoption of NECAP tests in grades 3-8, Vermont no longer averages test results over two years; annual determinations are made with one year of results. In addition, adoption of the new tests no longer requires placing equal weight on basic and analytical reporting areas, as each new NECAP (reading, mathematics, and writing) test reports one overall score. We will continue to index the 10th grade NSRE as we have in the past until the new high school NECAP tests are available.

AYP decisions for 9-12 high schools will be made as soon after receiving and verifying Spring 2006 NSRE results as possible – most likely October 2006. These decisions will apply to SY06-07. In Spring 2007, when Vermont makes AYP decisions to apply to SY07-08, decisions for 9-12 high schools will be based only on the academic indicator (graduation rate) for this one-time transitional decision. In Spring 2008, results from NECAP 2007 fall testing at grades 3-8 and grade 11 will determine school status for SY08-09.

The following table shows that in our transition plan we measure student learning for each school year and test a unique cohort each year. Moving from spring to fall testing, this plan avoids testing the same cohort of students twice, with most of the time between the two tests being summer vacation.

Assessment of SY 04-05 Based on:	Accountability for SY 05-06	Accountability for SY 06-07	Assessment of SY 05-06 Based on:	Accountability for SY 07-08	Assessment of SY 06-07 Based on:	Accountability For SY 08-09
For all schools except those schools that are 9-12 high schools						
Fall 2005 NECAP & Spring 2005 10 th grade NSRE	Determined in Fall 2005 using Academic Indicator (Transition)	Determined in Spring 2006 using Fall 2005 NECAP and Spring 2005 NSRE	Fall 2006 NECAP and Spring 2006 NSRE	Determined in Spring 2007 using 2006 NECAP, 2006 NSRE, academic indicator and participation	Fall 2007 NECAP	Determined in Spring 2008 using 2007 NECAP, academic indicator and participation
For 9-12 high schools only						
Spring 2005 10 th grade NSRE	Determined in Fall 05 using Spring 2005 NSRE, academic indicator and participation	<u>Determined in Fall 2006 using Spring 2006 NSRE, academic indicator and participation</u>	Spring 2006 NSRE	<u>Determined in Spring 2007 using academic indicator (graduation rate)</u>	Fall 2007 NECAP	Determined in Spring 2008 using 2007 NECAP, academic indicator and participation

As stated in 1.2 above, Vermont no longer applies the Small Schools review. Decisions are made at the all student level for all schools using the indexes.

Vermont continues to determine AYP for subgroups with more than 40 students in an assessment area in one year.

Because Vermont has just this year implemented the NECAP assessments, we are unable to apply Safe Harbor in 2006. In 2007 we will review Safe Harbor and will consider the adoption of a growth component to determine AYP. In addition, as shown in Rule 2568, school boards may use the appeals process after being identified for improvement or other consequences.

Preliminary data suggest that there will be an increase in the number of schools not making AYP – possibly from 13% to 20% of our schools (approximately 60 schools).

3.2 Accountability system has a method for determining whether student subgroups, public schools, and LEAs made adequate yearly progress.

3.2a Accountability system establishes a starting point

3.2b Accountability system establishes statewide annual measurable objectives

3.2c Accountability system establishes intermediate goals

Comments below address 3.2, 3.2a, 3.2b, and 3.2c above.

Vermont has set new grade span AMOs using the original 20th percentile model. We have adopted two grade span AMOs for the Spring 2006 AYP determinations - grades 3-8 and 7-12. The AMOs for grades 9-12 will continue as before until new NECAP tests are introduced in school year 2007-2008.

These AMOs apply to both schools and LEAs with grade spans that include just 3-8; those that include 7-12 and those that include 9-12.

	3-8	3-8		3-8 & 10	3-8 & 10		9-12	9-12
Year	Math AMOs	Reading AMOs		Math AMOs	Reading AMOs		Math AMOs	Reading AMOs
2006	390	403		341	377		326	384
2007	390	403		341	377		326	384
2008	427	435		394	418		384	423
2009	427	435		394	418		384	423
2010	427	435		394	418		384	423
2011	463	468		447	459		442	462
2012	463	468		447	459		442	462
2013	463	468		447	459		442	462
2014	500	500		500	500		500	500

Principle 4 Annual Decisions

Accountability system determines annually the progress of schools and districts

Through Act 64 of 2003 and Act 114 of 2004, the legislature authorized the Commissioner of Education to determine annually whether schools and LEAs are meeting state standards and making adequate yearly progress through school year 2006. This year, through Sec. 23 of H.867 (the Education Technical Corrections bill), the legislature extended this annual authority through school year 2008.

Principle 5 Subgroup Accountability

5.1 Accountability system includes all the required subgroups

5.2 Accountability system holds schools and LEAs accountable for the progress of student subgroups

5.3 Accountability system includes students with disabilities

5.4 Accountability system includes limited English proficient students

Comments below cover 5.1, 5.2, 5.3, and 5.4 above.

To ensure reliable decisions, Vermont will apply adequate yearly progress determinations only to subgroups with a minimum 'n' of 40 or more students in each reporting area in one year and across all grade levels.

Concerning the use of alternate assessments in accountability for students with disabilities, Vermont is preparing materials that update our alternate assessment system for the May 2006 Peer Review.

LEP students are included in the academic assessments following the flexibility provided by U.S. Department of Education LEP students who have attended school in the United States for less than one year are not required to participate in Reading/ELA assessments, but must participate in the mathematics and English language proficiency assessments. Vermont clarifies that it does not count fluent English proficient students in the LEP subgroup at this time.

5.5 Vermont has determined the minimum number of students sufficient to yield statistically reliable information for each purpose for which disaggregated data are used.

5.6 Accountability system protects the privacy of students when reporting results and when determining AYP.

Comments here apply to 5.5 and 5.6 above.

See comment at 5.4 above.

Principle 6 Based on Academic Assessments

6.1 Accountability system is based primarily on academic assessments

Please see comments under 1.1 and 1.2 above for a description of new assessments Vermont has adopted.

As stated before, we no longer use the Small Schools review.

Principle 7 Additional Indicators

7.1 Accountability system includes graduation rate for high schools.

7.2 Accountability system includes an additional academic indicator for elementary and middle schools.

7.3 Additional indicators are valid and reliable.

Comments below relate to 7.1, 7.2, and 7.3.

Vermont's updated calculation of graduation rate for high schools is a longitudinal cohort count and will allow for the disaggregation of subgroups, if needed, for safe harbor. Because this calculation counts transfers-in for the first time, the State has set the graduation rate at 72%. This change does not impact the number of schools that are below the threshold for not making AYP.

For the Spring 2006 AYP decision, Vermont will use the achievement of students in the bottom performance level of the NECAP Reading test for all grades tested in a school as the "additional academic indicator" for AYP purposes. This aligns with the State's past use of the bottom two-

achievement levels of the NSRE Reading Basic Understanding reporting area for schools that did not have grade 2 VT-DRA results. The criterion for identification remains unchanged at 15% or more of students in the lowest achievement level.

Principle 8 Separate Decisions for Reading/Language Arts and Mathematics

8.1 Accountability system holds students, schools, and districts separately accountable for reading/language arts and mathematics

There is no change in this section.

Principle 9 System Validity and Reliability

9.1 Accountability system produces reliable decisions

Apart from the use of a minimum ‘n’ of 40 students each year (instead of combining two years of test results in earlier years), there has been no change in the section.

9.2 Accountability system produces valid decisions

Vermont has in place, as required by Rule 2528, a Technical Advisory Panel (including a number of nationally recognized assessment and accountability experts), whose members help to ensure that state assessments and the Accountability System lead to valid (i. e., technically and educationally sound) decisions.

9.3 Accountability system has a plan for addressing changes in assessment and student population.

As shown by the successful development, adoption, and implementation of the NECAP tests, Vermont has in place a sound system for incorporating into its definition of AYP anticipated changes in assessments.

Principle 10 Participation Rate

10.1 Accountability system has a means for calculating the rate of participation in statewide assessments.

10.2 Accountability system has a means for applying the 95% assessment criteria to student subgroups and small schools